City of Idaho Falls

2021 Analysis of Impediments to Fair Housing Choice

Draft for Public Review

June 10, 2021

2021 CITY OF IDAHO FALLS

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE:

EQUAL HOUSING
OPPORTUNITY

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Has Your Right to Fair Housing

Been Violated?

If you feel you have experienced discrimination in the housing industry, please contact:

Idaho Human Rights Commission
317 W. Main St.
Second Floor
Boise, ID 83735-0660
inquiry@ihrc.idaho.gov
971-673-0761 (208) 334-2873
Toll Free: (888) 249-7025

Intermountain Fair Housing Council
4696 W. Overland Rd., Suite 140
Boise, Idaho 83705
208-383-0695
1-800-717-0695
contact@ifhcidaho.org

U.S. Department of Housing and Urban Development
Form 903 Online Complaint in English:
https://portalapps.hud.gov/FHEO903/Form903/Form903Start.action

HUD Formulario 903 quejas en línea:
https://portalapps.hud.gov/AdaptivePages/HUD_Spanish/Espanol/complaint/complaint-details.htm

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Section I. Executive Summary

Overview

Title VIII of the 1968 Civil Rights Act, also known as the Fair Housing Act, protects people from discrimination based on race, color, national origin, religion, sex, familial status, and disability when they are renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing related activities. The Act, and subsequent laws reaffirming its principles, seeks to overcome the legacy of segregation, unequal treatment, and historic lack of access to housing opportunity. There are several statutes, regulations, and executive orders that apply to fair housing, including the Fair Housing Act, the Housing Amendments Act, and the Americans with Disabilities Act.[1]

Affirmatively furthering fair housing is defined in the Fair Housing Act as taking "meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics".[2] Specifically, affirmatively furthering fair housing requires that recipients of federal housing and urban development funds take meaningful actions to address housing disparities, including replacing segregated living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.[3] Furthering fair housing can involve developing affordable housing, removing barriers to affordable housing development in high opportunity areas, investing in neighborhood revitalization, preserving and rehabilitating existing affordable housing units, improving housing access in areas of concentrated poverty, and improving community assets.

Assessing Fair Housing

Provisions to affirmatively further fair housing are long-standing components of the U.S. Department of Housing and Urban Development's (HUD's) housing and community development programs. These provisions come from Section 808(e)(5) of the Fair Housing Act, which requires that the Secretary of HUD administer federal housing and urban development programs in a manner that affirmatively furthers fair housing.[4]

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single planning process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle. As a part of the consolidated planning process, and entitlement communities that receive such funds from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing (AFFH).

In July of 2015, HUD released a new AFFH rule which provided a format, a review process, and content requirements for the newly named "Assessment of Fair Housing", or AFH.[5] The assessment would now

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[1] https://www.hud.gov/program_offices/fair_housing_equal_opp/fair_housing_and_related_law
[2] § 5.152 Affirmatively Furthering Fair Housing
[3] § 5.152 Affirmatively Furthering Fair Housing
[4] 42 U.S.C.3601 et seq.
[5] 80 FR 42271. https://www.federalregister.gov/documents/2015/07/16/2015-17032/affirmatively-furthering-fair-housing

include an evaluation of equity, the distribution of community assets, and access to opportunity within the community, particularly as it relates to concentrations of poverty among minority racial and ethnic populations. Areas of opportunity are physical places within communities that provide things one needs to thrive, including quality employment, high performing schools, affordable housing, efficient public transportation, safe streets, essential services, adequate parks, and full-service grocery stores. Areas lacking opportunity, then, have the opposite of these attributes.

The AFH includes measures of segregation and integration, while also providing some historical context about how such concentrations became part of the community's legacy. Together, these considerations were intended to better inform public investment decisions that would lead to amelioration or elimination of segregation, enhance access to opportunity, promote equity, and hence, housing choice. Equitable development requires thinking about equity impacts at the front end, prior to the investment occurring. That thinking involves analysis of economic, demographic, and market data to evaluate current issues for citizens who may have previously been marginalized from the community planning process. All this would be completed by using an on-line Assessment Tool.

However, on January 5, 2018, HUD issued a notice that extended the deadline for submission of an AFH by local government consolidated plan program participants to their next AFH submission date that falls after October 31, 2020.[6] Then, on May 18, 2018, HUD released three notices regarding the AFFH; one eliminated the January 5, 2018, guidance; a second withdrew the on-line Assessment Tool for local government program participants; and, the third noted that the AFFH certification remains in place. HUD went on to say that the AFFH databases and the AFFH Assessment Tool guide would remain available for the AI; and, encouraged jurisdictions to use them, if so desired.

Hence, the AI process involves a thorough examination of a variety of sources related to housing, the fair housing delivery system, housing transactions, locations of public housing authorities, areas having racial and ethnic concentrations of poverty and access to opportunity. The development of an AI also includes public input, public meetings to collect input from citizens and interested parties, distribution of draft reports for citizen review, and formal presentations of findings and impediments, along with actions to overcome the identified fair housing issues and impediments.

In accordance with the applicable statutes and regulations governing the Consolidated Plan, the City of Idaho Falls certifies that they will affirmatively further fair housing, by taking appropriate actions to overcome the effects of any impediments identified in the Analysis of Impediments to Fair Housing Choice and maintaining records that reflect the analysis and actions taken in this regard.

Socio-Economic Context

While the population in the City of Idaho Falls has grown by 8.2 percent between 2010 and 2019, the racial and ethnic makeup of the area is not changing significantly. Limited English Proficiency includes an estimated 3.7 percent of the population speaks Spanish at home, followed by 0.2 percent speaking Chinese. In 2019, 90.5 percent of households had a high school education or greater, including 27.4 percent with a high school diploma or equivalent, 35.1 percent with some college, 18.9 percent with a Bachelor's Degree, and 9.1 percent with a graduate or professional degree.

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[6] 83 FR 683 (January 5, 2018)

In 2019, unemployment in the City of Idaho Falls was at 2.4 percent, compared to 2.8 percent for the State of Idaho. This is representative of a labor force of 30,637 people and 29,916 people employed. Real Average Earning per job surpassed the state rate in recent years, and has continued to climb. Poverty has remained at 13.4 percent in 2019 and 2010 representing 8,101 persons living in poverty in 2019.

Single-family units account for an estimated 71.4percent of units in the City, while apartment units account for 12.5 percent. An estimated 26.0 percent of housing units were built in the 1970's, representing the largest age group in the housing stock. Some 16.2 percent of units have been built since 2000. The proportion of vacant units has not changed significantly since 2010. However, "other vacant" units, or those not available to the marketplace, have increased to represent 34.5 percent of vacant units. An estimated 65.3 percent of owner-occupied households currently have a mortgage, and 34.7 percent do not.

Overview of Findings

As a result of detailed demographic, economic, and housing analysis, along with a range of activities designed to foster public involvement and feedback, Idaho Falls has identified a series of fair housing issues/impediments, and other contributing factors that contribute to the creation or persistence of those issues.

Table I.1, on the following page, provides a list of the contributing factors that have been identified as causing these fair housing issues/impediments and prioritizes them according to the following criteria:
1. High: Factors that have a direct and substantial impact on fair housing choice
2. Medium: Factors that have a less direct impact on fair housing choice, or that Idaho Falls has limited authority to mandate change.
3. Low: Factors that have a slight or largely indirect impact on fair housing choice, or that Idaho Falls has limited capacity to address.

Table I.1		
Contributing Factors		
City of Idaho Falls		
Contributing Factors	**Priority**	**Justification**
Moderate to high levels of segregation	Low	Black and Native Hawaiian households had high levels of segregation. However, these racial groups represent a small percentage of the population, at less than one percent each of the overall population.
Access to labor market engagement	Low	Native American and Hispanic households have less access to labor market engagement as indicated by the Access to Opportunity index. However, the City has little control over impacting labor market engagement on a large scale.
Insufficient affordable housing in a range of unit sizes	High	Some 27.9 percent of households have cost burdens. This is more significant for renter households, of which 45.7 percent have cost burdens. This signifies a lack of housing options that are affordable to a large proportion of the population.
Racial and ethnic minority households with disproportionate rates of housing problems	High	The overall rate of housing problems in the City of Idaho Falls is 28.1 percent, according to CHAS data. Asian, American Indian, Pacific Islander, and Hispanic households experience housing problems at a disproportionate rate overall.
Discriminatory patterns in Lending	Med	Black and American Indian/ Native American applicant were denied at a rate of 16.2 and 14.3 percent, respectively, compared to 8.1 percent of white applicants. Hispanic applicants were denied at an average rate of 14.8 percent, compared to the 7.5 percent for non-Hispanic applicants.
Insufficient accessible affordable housing	High	The number of accessible affordable units may not meet the need of the growing elderly and disabled population, particularly as the population continues to age. Some 54.5 percent of persons aged 75 and older have at least one form of disability.
NIMBYism	High	Public input suggested one of the major barriers to the development of affordable housing options in the City was the Not In My Back Yard (NIMBY) mentality in the City.
Insufficient fair housing education	High	The fair housing survey and public input indicated a lack of knowledge about fair housing and a need for education.
Insufficient understanding of credit	High	The fair housing survey and public input indicated an insufficient understanding of credit needed to access mortgages.

FAIR HOUSING ISSUES, CONTRIBUTING FACTORS, AND PROPOSED ACHIEVEMENTS

Table I.2 summarizes the fair housing issues/impediments and contributing factors, including metrics, milestones, and a timeframe for achievements.

Table I.2			
Fair Housing Goal	**Fair Housing Issue(s)**	**Impediments to Fair Housing Choice/ Contributing Factors**	**Recommended Actions**
Promote affordable homeownership and rental opportunities	Segregation R/ECAPs Disproportionate Housing Needs Publicly Supported Housing	Moderate to high levels of segregation Inequitable access to labor market engagement Insufficient affordable housing in a range of unit sizes Discriminatory patterns in Lending	Promote homeownership and affordable rental opportunities with the use of CDBG funds. Over the next five (5) years: 5 Homeowner Housing Rehabilitated 5 Homeowner Housing units added
Promote Community Development activities in areas with higher rates of poverty	Disparities in Access to Opportunity	Moderate to high levels of segregation Inequitable access to labor market engagement	Promote public services, public facilities, and infrastructure improvements with CDBG funds in low to moderate income neighborhoods or to benefit LMI households. Over the next five (5) years: Benefit 3,000 households with improved access to public services
Promote community and service provider knowledge of ADA laws	Disability and Access	Insufficient accessible affordable housing	Increase outreach and education for housing providers in the City, focusing on legal requirements concerning reasonable accommodation, in coordination with local disability advocate organizations and Intermountain Fair Housing Council (IFHC). Record activities annually.
Increase outreach and education for housing providers in the County and the public	Fair Housing Enforcement and Outreach	Discriminatory patterns in Lending Insufficient fair housing education Insufficient understanding of credit NIMBYism	Continue to partner with IFHC to conduct fair housing outreach and education targeting rental tenants and landlords, providing an overview of fair housing laws and examples of discrimination that housing consumers may encounter in the rental and homeowner housing market. Include materials in both English and Spanish. Promote education through website and online materials, as well as printed materials at City offices and community centers/libraries. Record activities annually.

Section II. Community Participation Process

The following section describes the community participation process undertaken for the 2021 City of Idaho Falls Analysis of Impediments to Fair Housing Choice.

A. OVERVIEW

The outreach process included the Fair Housing Survey, a Fair Housing Forum, and a public review meeting.

The Fair Housing Survey was distributed as an internet outreach survey. As of the date of this document, 121 responses have been received.

Two (2) Fair Housing Forums were held on May 25th and May 26th, 2021 in order to gather feedback and input from stakeholders and members of the public.

The Draft for Public Review AI was made available on June 21st, 2021 and a 30-day public input period was initiated.

A public hearing will be held, during the public review period in order to gather feedback and input on the draft Analysis of Impediment. After the close of the public review period and inspection of comments received, the final draft will be made available to the public at the beginning of August 2021.

B. THE FAIR HOUSING SURVEY

The purpose of the survey, a relatively qualitative component of the AI, was to gather insight into knowledge, experiences, opinions, and feelings of stakeholders and interested citizens regarding fair housing as well as to gauge the ability of informed and interested parties to understand and affirmatively further fair housing. Many individuals and organizations throughout Idaho Falls were invited to participate. At the date of this document, some 121 responses were received. A complete set of survey responses can be found in *Section IV.I Fair Housing Survey Results*.

C. THE FAIR HOUSING FORUM

Two (2) Fair Housing Forums were held on May 25th at 10:00 am via webinar and on May 26th, 2021 at 5:00pm via webinar. The complete transcripts from these meetings are included in the Appendix. A summary of comments will be included below.

D. THE FINAL PUBLIC REVIEW PROCESS

A 30-day public review process will be held June 21st, 2021 through July 21st, 2021. It will include a public review meeting during this time. Comments from this meeting will be summarized below.

Section III. Assessment of Past Goals and Actions

2015-2020 Analysis of Impediments

A summary of the Conclusions and Recommendations from the 2015 Analysis of Impediments to Fair Housing Choice is included below:[7]

While the City of Idaho Falls has been moving in the right direction in terms of Fair Housing, there are some barriers to accessing housing in the City. These include the need for additional affordable housing options, which is limited by the cost of land. The City in encouraged to find creative solutions to encourage development. Special needs population, including persons experiencing homelessness, the elderly, persons with disabilities, and victims of domestic violence are in need of housing and services. The plan recommended a Fair Housing Task Force, as well as annual attendance at fair housing trainings and education events. The City also received the recommendation to review its zoning for minimum lot sizes and clustering housing units to encourage more affordable production, as well as introducing maximum lot sizes.

Past Actions

The City has undertaken a number of Fair Housing activities in the past few years to expand educational and outreach opportunities. These include the addition of maximum lot sizes in some zones in the City in order to encourage smaller footprints and more development. In addition, the City's Planned Unit Development Ordinance does not include minimum lot sizes and allows for clustering of units. The Public Works Department has committed to assist with a portion of the road costs that support the development of new affordable housing units.

The City recommended any CDBG recipients to participate in Fair Housing education activities. This included Habitat for Humanity Idaho Falls, Behavioral Health Center of Eastern Idaho, Idaho Legal Aid, CEI, and CLUB, Inc. in the 2020 Program Year.

The City sponsored a Housing Inventory Study for Idaho Falls and Bonneville County areas through Boise State University. The City also sponsored Fair Housing Workshops with the City of Pocatello, the local branch of IHFA and the Intermountain Fair Housing Council. This event was held virtually in 2021 due to the on-going COVID-19 Pandemic. The annual event has over 80 participants. The event is co-sponsored and funded between the City of Idaho Falls (CDBG funds), City of Pocatello, and IFHC. Each entity takes turns every year in planning and hosting the event with the City of Pocatello. The 2021 event was advertised well in advance to book speakers for this all-day event.

These on-going efforts by the City have expanded the educational opportunities for Fair Housing as well as eliminated some of the barriers to affordable housing development in the City.

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[7] https://www.idahofallsidaho.gov/DocumentCenter/View/12379/2016-2020-Analysis-of-Impediments-to-Fair-Housing-Choice-PDF

Section IV. Fair Housing Analysis

This section presents demographic, economic, and housing information that is drawn from the 2010 Census and American Community Survey (ACS) estimates unless otherwise noted. This analysis uses ACS Data to analyze a broad range of socio-economic characteristics, including population growth, race, ethnicity, disability, employment, poverty, and housing trends; these data are also available by Census tract, and are shown in geographic maps. Ultimately, the information presented in this section illustrates the underlying conditions that shape housing market behavior and housing choice in the City of Idaho Falls.

Lead Agency and Service Area

The City of Idaho Falls, led by the Community Development Services Department is the lead agency undertaking this Analysis of Impediments to Fair Housing Choice. The scope of this analysis covers the City of Idaho Falls, Idaho.

A. SOCIO-ECONOMIC OVERVIEW

Census Demographic Data

Census data is presented in one of four Summary Files (SF). In the 1980, 1990, and 2000 decennial censuses, the Census Bureau released the full SF1 100 percent count data[8], along with additional tabulations including the one-in-six SF3 sample. The Census Bureau did not collect additional sample data such as the SF3 in the 2010 decennial census, so many important housing and income concepts are not available in the 2010 Census.

To study these important housing and income concepts, the Census Bureau distributes the American Community Survey (ACS) every year to a sample of the population, then quantifies the results as one, three, and five-year averages. The one-year sample only includes responses from the year the survey was implemented, while the five-year sample includes responses over a five-year period. The five-year estimates are more robust than the one-or three-year samples because they include more responses and can be tabulated down to the Census tract level.

The Census Bureau collects race data according to U.S. Office of Management and Budget guidelines, and these data are based on self-identification. Ancestry refers to one's ethnic origin or descent, "roots," or heritage, or the place of birth of the person or the person's parents or ancestors before their arrival in the United States. Ethnic identities may or may not represent geographic areas. People may choose to report more than one race group and people of any race may be of any ethnic origin. Hispanic origin can be viewed as the heritage, nationality, lineage, or country of birth of the person or the person's parents or ancestors before arriving in the United States. People who identify as Hispanic, Latino, or Spanish may be any race.

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Population Characteristics

Idaho Falls population by race and ethnicity is shown in Table IV.1. The white population represented 88.1 percent of the population in 2019, compared with black populations accounting for 0.7 percent of the population in 2019. Hispanic households represented 14.8 percent of the population in 2019.

	2010 Census		2019 Five-Year ACS	
Table IV.1 **Population by Race and Ethnicity** Idaho Falls 2010 Census & 2019 Five-Year ACS				
Race	**Population**	**% of Total**	**Population**	**% of Total**
White	50,711	89.3%	54,167	88.1%
Black	396	0.7%	442	0.7%
American Indian	551	1.0%	344	0.6%
Asian	574	1.0%	917	1.5%
Native Hawaiian/ Pacific Islander	59	0.1%	43	0.1%
Other	3,209	5.6%	3,433	5.6%
Two or More Races	1,313	2.3%	2,113	3.4%
Total	**56,813**	**100.0%**	**61,459**	**100.0%**
Non-Hispanic	49,456	87.1%	52,384	85.2%
Hispanic	7,357	12.9%	9,075	14.8%

The change in race and ethnicity between 2010 and 2019 is shown in Table IV.2. During this time, the total non-Hispanic population was 52,384 persons in 2019, while the Hispanic population was 9,075.

Table IV.2
Population by Race and Ethnicity
Idaho Falls
2010 Census & 2019 Five-Year ACS

	2010 Census		2019 Five-Year ACS	
Race	**Population**	**% of Total**	**Population**	**% of Total**
Non-Hispanic				
White	47,208	95.5%	49,396	94.3%
Black	363	0.7%	367	0.7%
American Indian	379	0.8%	243	0.5%
Asian	565	1.1%	827	1.6%
Native Hawaiian/ Pacific Islander	56	0.1%	43	0.1%
Other	35	0.1%	20	0.0%
Two or More Races	850	1.7%	1,488	2.8%
Total Non-Hispanic	**49,456**	**100.0%**	**52,384**	**100.0%**
Hispanic				
White	3,503	47.6%	4,771	52.6%
Black	33	0.4%	75	0.8%
American Indian	172	2.3%	101	1.1%
Asian	9	0.1%	90	1.0%
Native Hawaiian/ Pacific Islander	3	0.0%	0	0.0%
Other	3,174	43.1%	3,413	37.6%
Two or More Races	463	6.3%	625	6.9%
Total Hispanic	**7,357**	**100.0**	**9,075**	**100.0%**
Total Population	**56,813**	**100.0%**	**61,459**	**100.0%**

Cohorts

Table IV.3 shows the population distribution in Idaho Falls by age. In 2010, children under the age of 5 accounted for 9.2 percent of the total population, which compared to 8.1 percent in 2019.

Age	2010 Census		2019 Five-Year ACS	
	Number of Persons	Percent	Number of Persons	Percent
Under 5	5,232	9.2	4,984	8.1
5 to 19	12,854	22.6	14,108	23.0
20 to 24	3,809	6.7	4,178	6.8
25 to 34	8,607	15.1	8,808	14.3
35 to 54	13,648	24.0	14,306	23.3
55 to 64	5,974	10.5	6,626	10.8
65 or Older	6,689	11.8	8,449	13.7
Total	**56,813**	**100%**	**61,459**	**100%**

Table IV.3
Population Distribution by Age
Idaho Falls
2019 Five-Year ACS Data

Table IV.4 shows the population in Idaho Falls by age and gender. In 2010, there were 8,607 people aged 25 to 34, made up of 4,426 men, and 4,181 women. In comparison, in 2019, there were 8,808 people in the 25 to 34 age cohort, with 4,410 men and 4,398 women.

Table IV.4
Population by Age and Gender
Idaho Falls
2010 Census & 2019 Five-Year ACS Data

Age	2010 Census				2019 Five Year ACs			
	Male	Female	Total	Percent	Male	Female	Total	Percent
Under 5	2,705	2,527	5,232	9.2%	2,906	2,078	4,984	8.1%
5 to 19	6,550	6,304	12,854	22.6%	7,120	6,988	14,108	23.0%
20 to 24	1,824	1,985	3,809	6.7%	2,058	2,120	4,178	6.8%
25 to 34	4,426	4,181	8,607	15.1%	4,410	4,398	8,808	14.3%
35 to 54	6,821	6,827	13,648	24.0%	7,218	7,088	14,306	23.3%
55 to 64	2,955	3,019	5,974	10.5%	3,307	3,319	6,626	10.8%
65 and Older	2,860	3,829	6,689	11.8%	3,881	4,568	8,449	13.7%
Total	**28,141**	**28,672**	**56,813**	**100%**	**30,900**	**30,559**	**61,459**	**100%**

Diagram IV.1
Population Distribution by Age
Idaho Falls
2010 Census and 2019 Five-Year ACS Data

Idaho Falls city   2010 Census and 2019 ACS
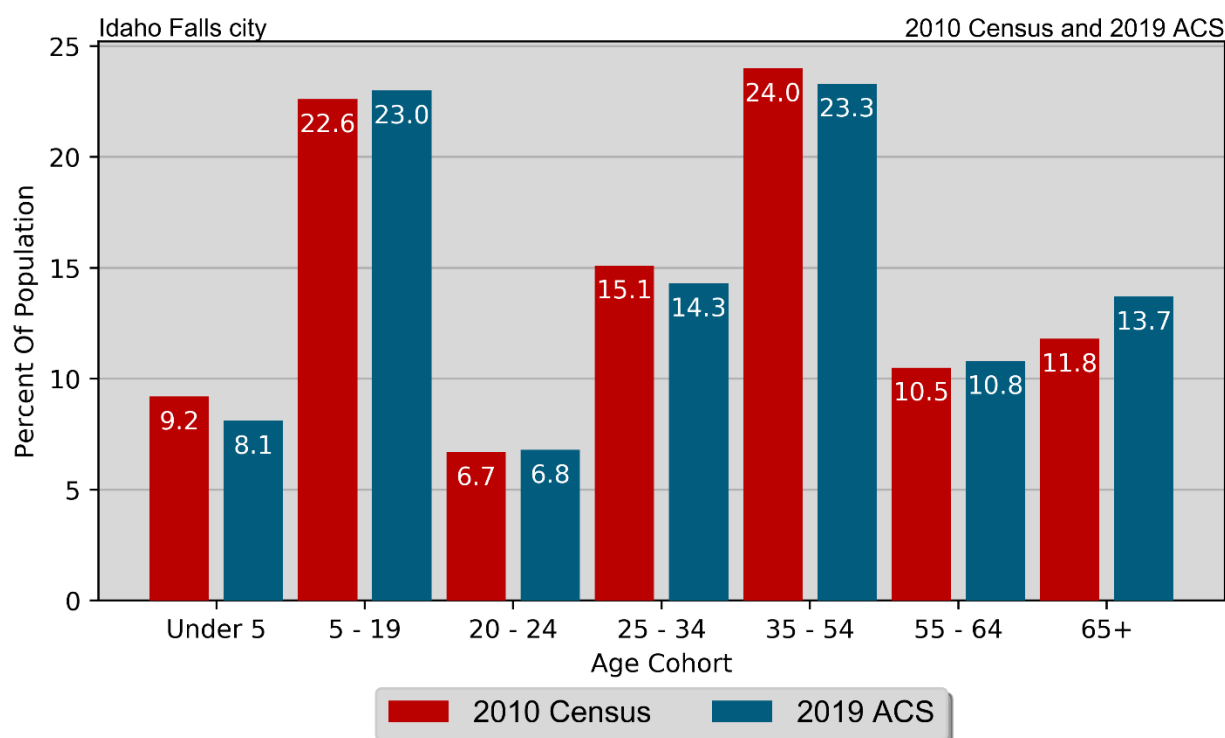
Group Quarters Population

The group quarters population includes the institutionalized population, who live in correctional institutions, juvenile facilities, nursing homes, and other institutions, and the non-institutionalized population, who live in college dormitories, military quarters, and other group living situations. As seen in Table IV.5, between 2000 and 2010, the institutionalized population changed -29.0 percent in Idaho Falls, from 672 people in 2000 to 477 in 2010. The non-institutionalized population changed 94.9 percent, from 274 in 2000 to 534 in 2010.

Table IV.5 Group Quarters Population Idaho Falls 2000 & 2010 Census SF1 Data					
Group Quarters Type	**2000 Census**		**2010 Census**		**% Change 00–10**
	Population	**% of Total**	**Population**	**% of Total**	
Institutionalized					
Correctional Institutions	362	53.9%	328	68.8%	-9.4%
Juvenile Facilities	.	.	29	6.1%	.
Nursing Homes	93	13.8%	72	15.1%	-22.6%
Other Institutions	217	32.3%	48	10.1%	-77.9%
Total	**672**	**100.0%**	**477**	**100.0%**	**-29.0%**
Noninstitutionalized					
College Dormitories	0	0.0%	0	0.0%	%
Military Quarters	0	0.0%	0	0.0%	%
Other Noninstitutionalized	274	100.0%	534	100.0%	94.9%
Total	**274**	**100.0%**	**534**	**100.0%**	**94.9%**
Group Quarters Population	**946**	**100.0%**	**1,011**	**100.0%**	**6.9%**

Foreign Born Populations and Limited English Proficiency

Under Title VI of the Civil Rights Act of 1964 and in accordance with Supreme Court precedent in Lau v. Nichols, recipients of federal financial assistance are required to take reasonable steps to ensure meaningful access to their programs and activities by limited English proficient (LEP) persons.[9] In the context of HUD's assessment of access to housing, LEP refers to a person's limited ability to read, write, speak, or understand English.[10]

The number of foreign-born persons is shown in Table IV.6. An estimated 3.2 percent of the population was born in Mexico, some 0.4 percent were born in Guatemala, and another 0.2 percent were born in China, excluding Hong Kong and Taiwan.

Table IV.6 Place of Birth for the Foreign-Born Population Idaho Falls 2019 Five-Year ACS			
Number	**Country**	**Number of Person**	**Percent of Total Population**
#1 country of origin	Mexico	1,956	3.2%
#2 country of origin	Guatemala	219	0.4%
#3 country of origin	China, excluding Hong Kong and Taiwan	145	0.2%
#4 country of origin	Canada	103	0.2%
#5 country of origin	Russia	91	0.1%
#6 country of origin	Ecuador	83	0.1%
#7 country of origin	Germany	82	0.1%
#8 country of origin	Korea	71	0.1%
#9 country of origin	Brazil	68	0.1%
#10 country of origin	Nepal	64	0.1%

The language spoken at home for those with Limited English Proficiency are shown in Table IV.7. An estimated 3.7 percent of the population speaks Spanish at home, followed by 0.2 percent speaking Chinese.

Table IV.7 Limited English Proficiency and Language Spoken at Home Idaho Falls 2019 Five-Year ACS			
Number	**Country**	**Number of Person**	**Percent of Total Population**
#1 LEP Language	Spanish	2,091	3.7%
#2 LEP Language	Chinese	118	0.2%
#3 LEP Language	Other Indo-European languages	51	0.1%
#4 LEP Language	Other and unspecified languages	44	0.1%
#5 LEP Language	Korean	40	0.1%
#6 LEP Language	Other Asian and Pacific Island languages	30	0.1%
#7 LEP Language	Russian, Polish, or other Slavic languages	22	0.0%
#8 LEP Language	French, Haitian, or Cajun	13	0.0%
#9 LEP Language	Tagalog	10	0.0%
#10 LEP Language	Arabic	0	0.0%

[9] https://www.hud.gov/program_offices/fair_housing_equal_opp/limited_english_proficiency_0
[10] https://www.hud.gov/sites/documents/LEPMEMO091516.PDF

Education and Employment

Education and employment data from Idaho Falls 2019 Five-Year ACS is presented in Table IV.8, Table IV.9, and Table IV.10. In 2019, 28,901 people were in the labor force, including 27,777 employed and 1,124 unemployed people. The unemployment rate for Idaho Falls was estimated at 3.9 percent in 2019.

Table IV.8 Employment, Labor Force and Unemployment Idaho Falls 2019 Five-Year ACS Data	
Employment Status	**2019 Five-Year ACS**
Employed	27,777
Unemployed	1,124
Labor Force	**28,901**
Unemployment Rate	3.9%

Table IV.9 and Table IV.10 show educational attainment in Idaho Falls. In 2019, 90.5 percent of households had a high school education or greater, including 27.4 percent with a high school diploma or equivalent, 35.1 percent with some college, 18.9 percent with a Bachelor's Degree, and 9.1 percent with a graduate or professional degree.

Table IV.9 High School or Greater Education Idaho Falls 2019 Five-Year ACS Data	
Education Level	**Households**
High School or Greater	39,633
Total Households	22,889
Percent High School or Above	**90.5%**

Table IV.10 Educational Attainment Idaho Falls 2019 Five-Year ACS Data		
Education Level	**2019 Five-Year ACS**	**Percent**
Less Than High School	4,138	9.5%
High School or Equivalent	12,015	27.4%
Some College or Associates Degree	15,359	35.1%
Bachelor's Degree	8,268	18.9%
Graduate or Professional Degree	3,991	9.1%
Total Population Above 18 years	**43,771**	**100.0%**

Commuting Patterns

Table IV.11 shows the place of work by county of residence. In 2010 87.7 percent of residents worked within the county they reside with 10.7 percent working outside their home county. This compares to 87.3 percent of residents in 2019 who worked within the county in which they resided and 11.2 percent of residents worked outside their home county but still within the state.

Table IV.11 Place of Work Idaho Falls 2010 and 2019 Five-Year ACS Data				
Place of work	**2010 Five-Year ACS**	**% of Total**	**2019 Five-Year ACS**	**% of Total**
Worked in county of residence	22,211	87.7%	23,784	87.3%
Worked outside county of residence	2,709	10.7%	3,055	11.2%
Worked outside state of residence	400	1.6%	413	1.5%
Total	**25,320**	**100.0%**	**27,252**	**100.0%**

Table IV.12 shows the aggregate travel time to work based on place of work and residence. In Idaho Falls the total aggregate travel time was 466,105 minutes, with residents working in their home county spending a total of 332,250 minutes traveling.

Table IV.12 Aggregate Travel Time to Work (in Minutes) Idaho Falls 2010 & 2019 Five-Year ACS Data				
Place of Work	**2010 Five-Year ACS**	**% of Total**	**2019 Five-Year ACS**	**% of Total**
Worked in county of residence	320,445	71.3%	332,250	71.3%
Worked outside county of residence	113,620	25.3%	113,595	24.4%
Worked outside State of residence	15,380	3.4%	20,260	4.3%
Aggregate travel time to work (in minutes):	**449,450**	**100.0%**	**466,105**	**100.0%**

Table IV.13 shows the average travel time to work based on place of work and residence. In 2019 the overall aggregate travel time was 449,450 minutes. Residents working within their home county spent an average of 14.0 minutes commuting to work, with those working outside their county of residence spending an average of 37.2 minutes on their commute.

Table IV.13 Average Travel Time to Work (in Minutes) Idaho Falls 2010 & 2019 Five-Year ACS Data		
Place of Work	**2010 Five-Year ACS**	**2019 Five-Year ACS**
Worked in county of residence	14.4	14.0
Worked outside county of residence	41.9	37.2
Worked outside State of residence	38.5	49.1
Average travel time to work (in minutes):	**17.8**	**17.1**

Table IV.14 shows the means of transportation to work. In 2019, 78.4 percent of commuters drove alone in a car, truck, or van. Only 9.9 percent carpooled, with an additional 3.4 percent taking public transportation. Also, there were 1,151 persons or 4.2 percent who worked from home.

Table IV.15 shows the breakdown of the means of transportation by tenure. In 2019, 52.2 percent of commuters owned their home and commuted alone by car, which compares to 53.7 percent in 2010. There were also 7,155 renters who drove alone in 2019 and accounted for 26.3 percent of the total commuter population. Commuters who owned their own home and took public transportation represented 2.6 percent of the population, which compares to 224 renters, or 0.8 percent taking public transportation.

Table IV.14
Means of Transportation to Work
Idaho Falls
2010 & 2019 Five-Year ACS Data

Means	2010 Five-Year ACS	% of Total	2019 Five-Year ACS	% of Total
Car, truck, or van: Drove alone	18,838	74.4%	21,378	78.4%
Car, truck, or van: Carpooled:	3,579	14.1%	2,708	9.9%
Public transportation (excluding taxicab):	879	3.5%	929	3.4%
Taxicab	48	0.2%	19	0.1%
Motorcycle	122	0.5%	56	0.2%
Bicycle	291	1.1%	109	0.4%
Walked	635	2.5%	652	2.4%
Other means	202	0.8%	250	0.9%
Worked at home	726	2.9%	1,151	4.2%
Total	**25,320**	**100.0%**	**27,252**	**100.0%**

Table IV.15 shows the breakdown of the means of transportation by tenure. In 2019, 52.2 percent of commuters owned their home and commuted alone by car, which compares to 53.7 percent in 2010. There were also 7,155 renters who drove alone in 2019 and accounted for 26.3 percent of the total commuter population. Commuters who owned their own home and took public transportation represented 2.6 percent of the population, which compares to 224 renters, or 0.8 percent taking public transportation.

Table IV.15
Means Of Transportation To Work By Tenure
Idaho Falls
2010 & 2019 Five-Year ACS Data

Tenure	2010 Five-Year ACS	% of Total	2019 Five-Year ACS	% of Total
Car, truck, or van - drove alone:				
Owner	13,585	53.7%	14,192	52.2%
Renter	5,253	20.7%	7,155	26.3%
Car, truck, or van - carpooled:				
Owner	2,199	8.7%	1,503	5.5%
Renter	1,380	5.5%	1,190	4.4%
Public transportation (excluding taxicab):				
Owner	673	2.7%	698	2.6%
Renter	206	0.8%	224	0.8%
Walked:				
Owner	311	1.2%	245	0.9%
Renter	324	1.3%	399	1.5%
Taxicab, motorcycle, bicycle, or other means:				
Owner	374	1.5%	278	1.0%
Renter	289	1.1%	136	0.5%
Worked at home:				
Owner	590	2.3%	845	3.1%
Renter	136	0.5%	306	1.1%
Total:	**25,320**	**100.0%**	**27,171**	**100.0%**

Summary

While the population in the City of Idaho Falls has grown by 8.2 percent between 2010 and 2019, the racial and ethnic makeup of the area is not changing significantly. Limited English Proficiency includes an estimated 3.7 percent of the population speaks Spanish at home, followed by 0.2 percent speaking Chinese. In 2019, 90.5 percent of households had a high school education or greater, including 27.4 percent with a high school diploma or equivalent, 35.1 percent with some college, 18.9 percent with a Bachelor's Degree, and 9.1 percent with a graduate or professional degree.

Economics

The following section describes the economic context for Idaho Falls. The data presented here is from the Bureau of Economic Analysis (BEA) and the Bureau of Labor Statistics (BLS). The data from the BEA is only available at the County level and shows the entirety of Bonneville County. The BLS data presented below is specified for Idaho Falls.

Labor Force and Employment

Table IV.16 shows labor force statistics for Idaho Falls between 1990 and 2019. The unemployment rate in Idaho Falls was 2.4 percent in 2019, with 721 unemployed persons and 30,637 in the labor force. The statewide unemployment rate in 2019 was 2.8 percent. In 2019, 29,916 people were employed, 721 were unemployed, and the labor force totaled 30,637 people.

Table IV.16 Labor Force Statistics Idaho Falls 1990 - 2019 BLS Data					
Year	**Idaho Falls**				**Statewide Unemployment Rate**
	Unemployment	**Employment**	**Labor Force**	**Unemployment Rate**	
1990	920	22,974	23,894	3.9%	5.6%
1991	1,091	24,088	25,179	4.3%	6.3%
1992	1,310	24,627	25,937	5.1%	6.5%
1993	1,191	25,440	26,631	4.5%	6.1%
1994	1,216	25,916	27,132	4.5%	5.5%
1995	1,232	25,785	27,017	4.6%	5.5%
1996	1,201	26,177	27,378	4.4%	5.4%
1997	1,117	27,038	28,155	4.0%	5.2%
1998	1,104	27,403	28,507	3.9%	5.2%
1999	1,055	27,703	28,758	3.7%	5.0%
2000	963	24,616	25,579	3.8%	4.7%
2001	1,052	25,273	26,325	4.0%	5.1%
2002	1,140	25,806	26,946	4.2%	5.6%
2003	1,159	27,092	28,251	4.1%	5.6%
2004	1,097	27,650	28,747	3.8%	4.9%
2005	991	29,147	30,138	3.3%	4.0%
2006	894	29,653	30,547	2.9%	3.4%
2007	659	27,137	27,796	2.4%	3.1%
2008	1,015	26,660	27,675	3.7%	5.0%
2009	1,847	25,782	27,629	6.7%	8.7%
2010	1,956	25,423	27,379	7.1%	8.8%
2011	1,924	25,451	27,375	7.0%	8.2%
2012	1,848	25,480	27,328	6.8%	7.4%
2013	1,717	25,567	27,284	6.3%	6.8%
2014	1,079	26,140	27,219	4.0%	4.4%
2015	936	27,027	27,963	3.3%	3.9%
2016	918	27,708	28,626	3.2%	3.7%
2017	807	28,264	29,071	2.8%	3.2%
2018	734	28,810	29,544	2.5%	2.8%
2019	721	29,916	30,637	2.4%	2.8%

Diagram IV.2 shows the unemployment rate for both the State and Idaho Falls. During the 1990's the average rate for Idaho Falls was 4.3 percent, which compared to 5.6 percent statewide. Between 2000 and 2010 the unemployment rate had an average of 3.9 percent, which compared to 5.0 percent statewide. Since 2010, the average unemployment rate was 4.5 percent. Over the course of the entire period Idaho Falls had an average unemployment rate lower than the State, 4.2 percent for Idaho Falls, versus 5.2 statewide.

Diagram IV.2
Annual Unemployment Rate
Idaho Falls
1990 – 2019 BLS Data
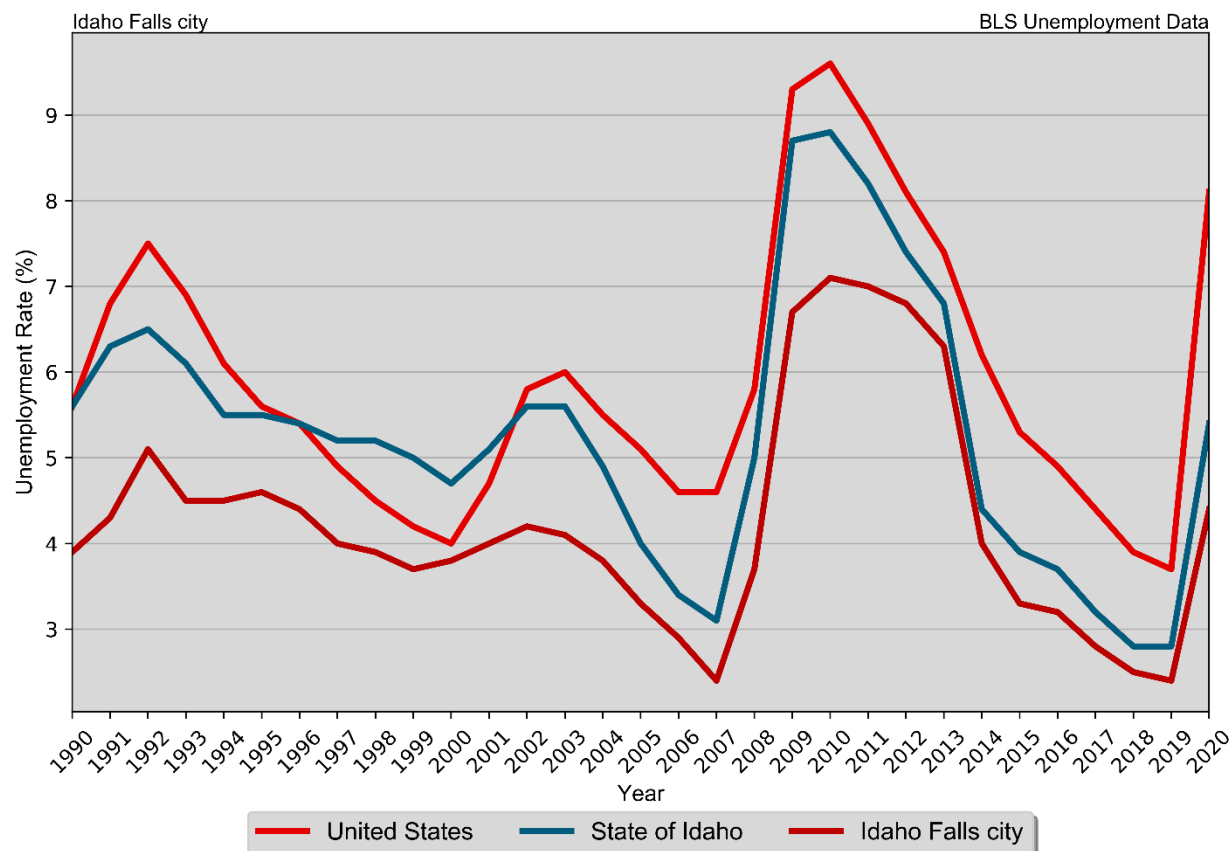
Diagram IV.3shows real average earnings per job for Bonneville County from 1990 to 2019. Over this period the average earning per job for Bonneville County was 45,024 dollars, which was lower than the statewide average of 45,094 dollars over the same period.

Diagram IV.3
Real Average Earnings per Job
Bonneville County
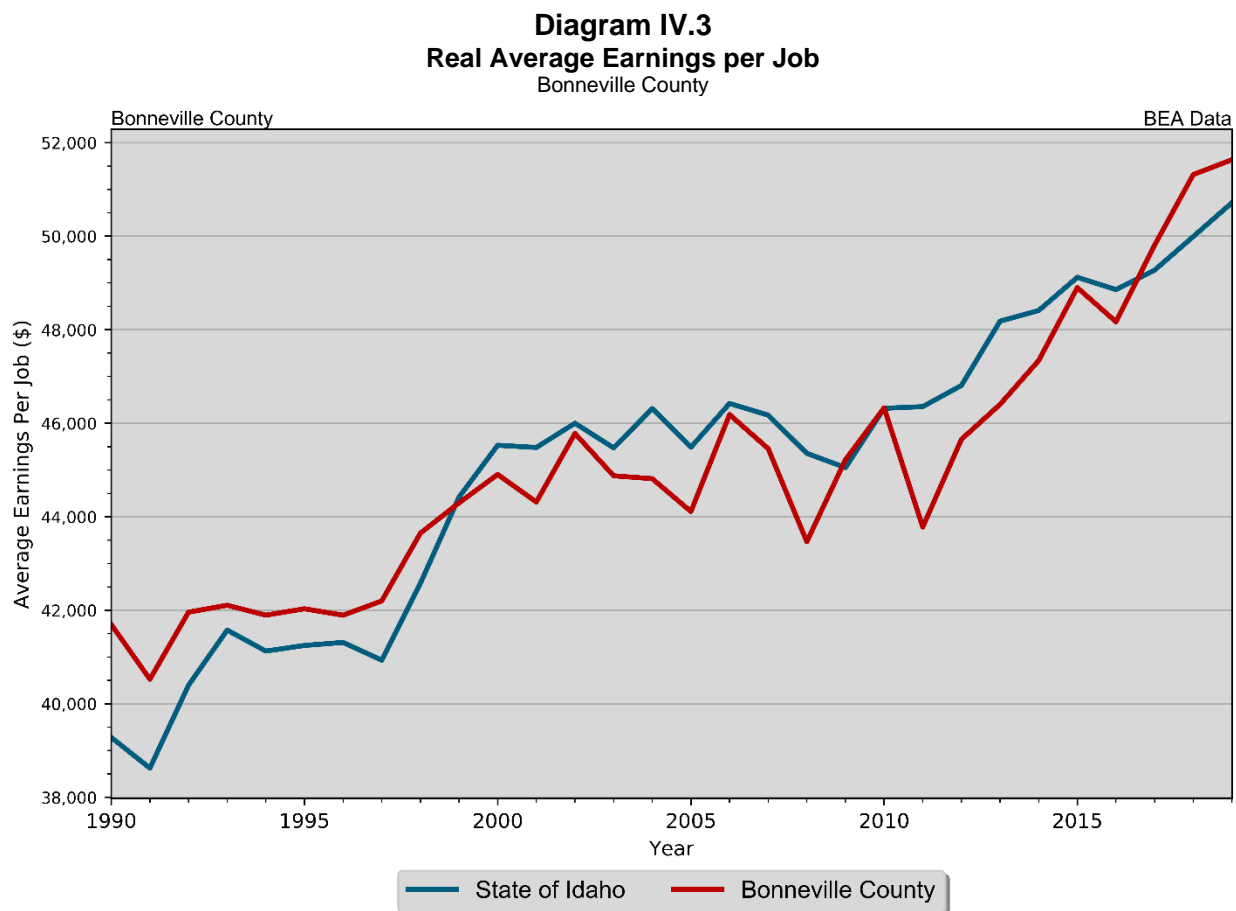
ACS Employment by Industry

Table IV.17 shows employment and median earnings by industry for Idaho Falls from the 2019 Five-Year ACS. In 2019 the largest industry by number of people employed in Idaho Falls was Health Care, which employed 2,515 people and paid a median salary of 35,576 dollars. The highest paying industry in Idaho Falls was the Prof Service industry, which paid a median salary of 98,000 dollars in 2019.

Table IV.17
Employment by Industry
Idaho Falls
2019 Five-Year ACS Data

Industry	Total Employment	Percent of Employment	Median Earnings
Farming	699	3.7%	$46,157
Mining	91	0.5%	$64,750
Construction	1,633	8.7%	$42,832
Manufacturing	1,895	10.1%	$36,450
Wholesale	702	3.7%	$42,742
Retail	2,304	12.2%	$28,860
Transport	759	4.0%	$52,352
Utilities	210	1.1%	$67,722
Info	329	1.7%	$33,651
Finance	556	3.0%	$44,429
Real Estate	317	1.7%	$39,471
Prof Service	2,138	11.4%	$98,000
Management	8	0.0%	$
Admin	858	4.6%	$40,567
Education	1,139	6.0%	$37,176
Health Care	2,515	13.4%	$35,576
Arts	81	0.4%	$60,375
Food	1,051	5.6%	$19,963
Other	496	2.6%	$30,887
Government	1,047	5.6%	$67,150

Diagram IV.4
Earnings and Employment by Industry

Idaho Falls city — 2019 Five-Year ACS
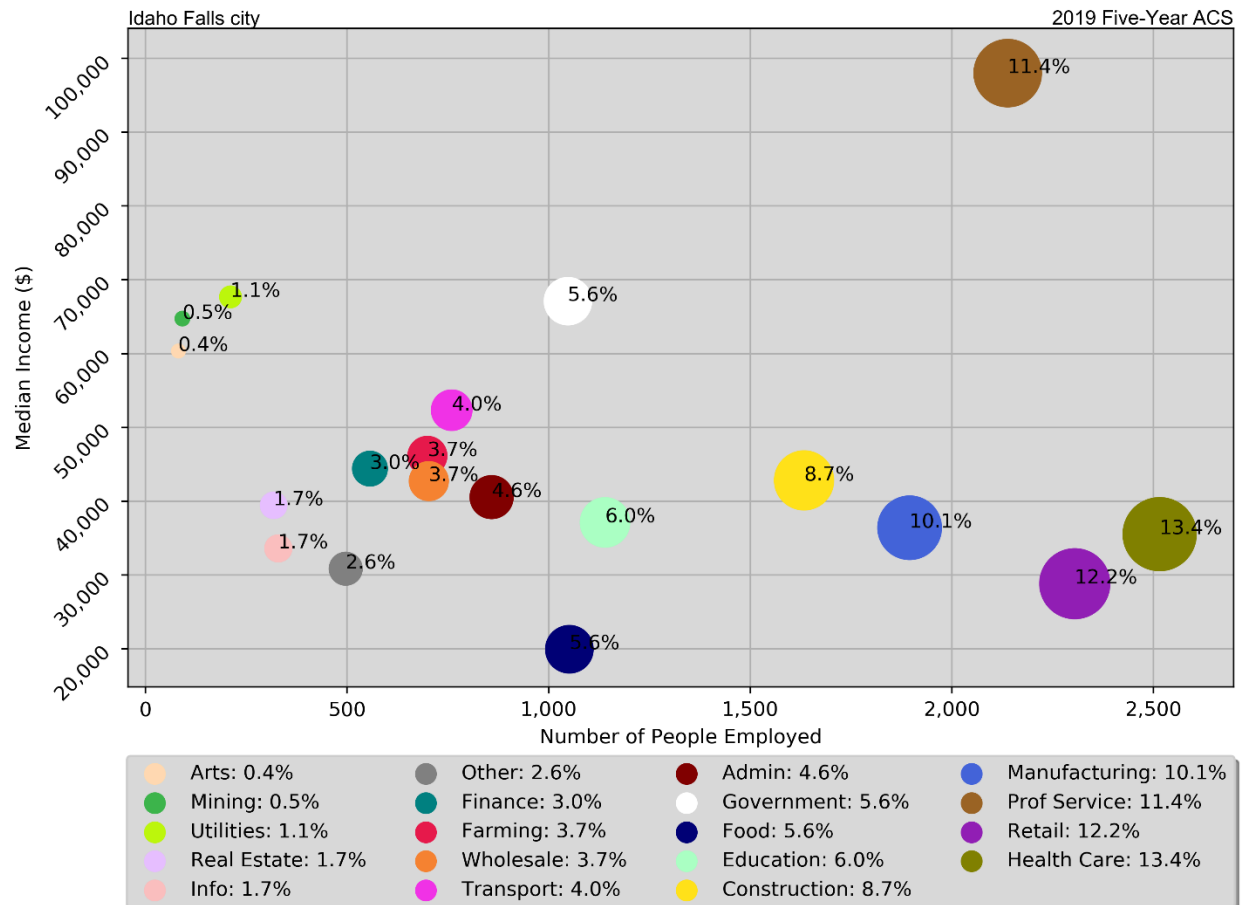
Poverty

The rate of poverty for Idaho Falls is shown in Table IV.19. In 2019, the poverty rate was 13.4 percent meaning there were an estimated 8,101 people living in poverty, compared to 10.9 percent living in poverty in 2000. In 2019, some 18.7 percent of those in poverty were under age 6 and 7.8 percent were 65 or older.

Table IV.19 Poverty by Age Idaho Falls 2010 & 2019 Five-Year ACS Data				
Age	**2010 Five-Year ACS**		**2019 Five-Year ACS**	
	Persons in Poverty	**% of Total**	**Persons in Poverty**	**% of Total**
Under 6	1,244	21.1%	1,102	18.7%
6 to 17	1,534	15.4%	1,814	15.8%
18 to 64	4,062	12.5%	4,533	13.1%
65 or Older	528	8.2%	652	7.8%
Total	**7,368**	**100.0%**	**8,101**	**100.0%**
Poverty Rate	**13.4%**	**.**	**13.4%**	**.**

Summary

In 2019, unemployment in the City of Idaho Falls was at 2.4 percent, compared to 2.8 percent for the State of Idaho. This is representative of a labor force of 30,637 people and 29,916 people employed. Real Average Earning per job surpassed the state rate in recent years and has continued to climb. Poverty has remained at 13.4 percent in 2019 and 2010 representing 8,101 persons living in poverty in 2019.

Housing

Housing and Household Characteristics

Households by type and tenure are shown in Table IV.20. Family households represented 66.0 percent of households, while non-family households accounted for 34.0 percent. These changed from 68.4 and 31.6 percent, respectively.

	Table IV.20			
	Household Type by Tenure			
	Idaho Falls			
	2010 Census SF1 & 2019 Five-Year ACS Data			
Household Type	**2010 Census**		**2019 Five-Year ACS**	
	Households	**Households**	**Households**	**% of Total**
Family Households	14,510	68.4%	15,110	66.0%
Married-Couple Family	11,119	76.6%	11,628	77.0%
Owner-Occupied	8,940	80.4%	9,124	78.5%
Renter-Occupied	2,179	19.6%	2,504	21.5%
Other Family	3,391	23.4%	3,482	22.4%
Male Householder, No Spouse Present	1,005	29.6%	1,179	28.9%
Owner-Occupied	513	51.0%	529	44.9%
Renter-Occupied	492	49.0%	650	55.1%
Female Householder, No Spouse Present	2,386	70.4%	2,303	68.5%
Owner-Occupied	1,112	46.6%	1,041	45.2%
Renter-Occupied	1,274	53.4%	1,262	54.8%
Non-Family Households	6,693	31.6%	7,779	34.0%
Owner-Occupied	3,358	50.2%	3,748	48.2%
Renter-Occupied	3,335	49.8%	4,031	51.8%
Total	**21,203**	**100.0%**	**22,889**	**100.0%**

Table IV.21, below, shows housing units by type in 2010 and 2019. In 2010, there were 23,085 housing units, compared with 24,617 in 2019. Single-family units accounted for 71.4 percent of units in 2019, compared to 71.6 in 2010. Apartment units accounted for 12.5 percent in 2019, compared to 10.5 percent in 2010.

	Table IV.21			
	Housing Units by Type			
	Idaho Falls			
	2010 & 2019 Five-Year ACS Data			
Unit Type	**2010 Five-Year ACS**		**2019 Five-Year ACS**	
	Units	**% of Total**	**Units**	**% of Total**
Single-Family	16,539	71.6%	17,582	71.4%
Duplex	903	3.9%	450	1.8%
Tri- or Four-Plex	2,409	10.4%	2,696	11.0%
Apartment	2,431	10.5%	3,066	12.5%
Mobile Home	803	3.5%	799	3.2%
Boat, RV, Van, Etc.	0	0.0%	24	0.1%
Total	**23,085**	**100.0%**	**24,617**	**100.0%**

Table IV.22 shows housing units by tenure from 2010 to 2019. By 2019, there were 24,617 housing units. An estimated 63.1 percent were owner-occupied, and 7.0 percent were vacant.

Table IV.22 Housing Units by Tenure Idaho Falls 2010 Census & 2019 Five-Year ACS Data				
Tenure	**2010 Census**		**2019 Five-Year ACS**	
	Units	**% of Total**	**Units**	**% of Total**
Occupied Housing Units	21,203	91.9%	22,889	93.0%
Owner-Occupied	13,923	65.7%	14,442	63.1%
Renter-Occupied	7,280	34.3%	8,447	36.9%
Vacant Housing Units	1,774	7.7%	1,728	7.0%
Total Housing Units	**23,085**	**100.00%**	**24,617**	**100.0%**

Households by income for the 2010 and 2019 Five-Year ACS are shown in Table IV.23. Households earning more than 100,000 dollars per year represented 23.9 percent of households in 2019, compared to 16.1 percent in 2010. Meanwhile, households earning less than 10,000 dollars accounted for 5.7 percent of households in 2019, compared to 6.3 percent in 2000.

Table IV.23 Households by Income Idaho Falls 2010 & 2019 Five-Year ACS Data				
Income	**2010 Five-Year ACS**		**2019 Five-Year ACS**	
	Households	**% of Total**	**Households**	**% of Total**
Less than $10,000	1,324	6.3%	1,306	5.7%
$10,000 to $14,999	1,085	5.2%	1,024	4.5%
$15,000 to $19,999	1,128	5.4%	1,405	6.1%
$20,000 to $24,999	1,591	7.6%	1,076	4.7%
$25,000 to $29,999	1,526	7.3%	1,264	5.5%
$30,000 to $34,999	1,246	6.0%	1,264	5.5%
$35,000 to $39,999	1,250	6.0%	1,348	5.9%
$40,000 to $44,999	1,058	5.1%	1,076	4.7%
$45,000 to $49,999	1,019	4.9%	1,082	4.7%
$50,000 to $59,999	1,673	8.0%	1,743	7.6%
$60,000 to $74,999	2,174	10.4%	2,341	10.2%
$75,000 to $99,999	2,442	11.7%	2,495	10.9%
$100,000 to $124,999	1,248	6.0%	1,956	8.5%
$125,000 to $149,999	786	3.8%	1,171	5.1%
$150,000 to $199,999	877	4.2%	1,180	5.2%
$200,000 or more	456	2.2%	1,158	5.1%
Total	**20,883**	**100.0%**	**22,889**	**100.0%**

Table IV.24 shows households by year home built for the 2010 and 2019 Five-Year ACS Data. Housing units built between 2000 and 2009, account for 12.8 percent of households in 2010 and 13.3 percent of households in 2019. Housing units built in 1939 or earlier represented 8.9 percent of households in 2019 and 8.7 percent of households in 2010.

Table IV.24				
Households by Year Home Built				
Idaho Falls				
2010 & 2019 Five-Year ACS Data				
Year Built	**2010 Five-Year ACS**		**2019 Five-Year ACS**	
	Households	**% of Total**	**Households**	**% of Total**
1939 or Earlier	1,823	8.7%	2,029	8.9%
1940 to 1949	1,091	5.2%	1,168	5.1%
1950 to 1959	3,928	18.8%	3,553	15.5%
1960 to 1969	2,549	12.2%	2,737	12.0%
1970 to 1979	4,281	20.5%	3,698	16.2%
1980 to 1989	2,049	9.8%	2,418	10.6%
1990 to 1999	2,489	11.9%	3,027	13.2%
2000 to 2009	2,673	12.8%	3,036	13.3%
2010 or Later	.	.	1,223	5.3%
Total	**20,883**	**100.0%**	**22,889**	**100.0%**

The distribution of unit types by race are shown in Table IV.25. An estimated 74.5 percent of white households occupy single-family homes, compared to 30.5 percent of black households. Some 11.3 percent of white households occupied apartments, compared to 8.5 percent of black households. An estimated 55.8 percent of Asian, and 44.0 percent of American Indian households occupy single-family homes.

Table IV.25							
Distribution of Units in Structure by Race							
Idaho Falls							
2019 Five-Year ACS Data							
Unit Type	**White**	**Black**	**American Indian**	**Asian**	**Native Hawaiian/Pacific Islanders**	**Other**	**Two or More Races**
Single-Family	74.5%	30.5%	44.0%	55.8%	100.0%	55.0%	52.1%
Duplex	1.9%	0.0%	0.0%	0.0%	0.0%	0.0%	6.4%
Tri- or Four-Plex	9.5%	58.2%	12.8%	23.4%	0.0%	22.3%	18.0%
Apartment	11.3%	8.5%	43.1%	12.0%	0.0%	14.4%	23.5%
Mobile Home	2.9%	2.8%	0.0%	0.0%	0.0%	8.3%	0.0%
Boat, RV, Van, Etc.	0.0%	0.0%	0.0%	8.8%	0.0%	0.0%	0.0%
Total	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**

The disposition of vacant units between 2010 and 2019 are shown in Table IV.26. An estimated 48.6 percent of vacant units were for rent in 2010. In addition, some 23.1 percent of vacant units were for sale. "Other" vacant units represented 14.3 percent of vacant units in 2010. "Other" vacant units are not for sale or rent, or otherwise available to the marketplace. These units may be problematic if concentrated in certain areas and may create a "blighting" effect.

By 2019, for rent units accounted for 32.8 percent of vacant units, while for sale units accounted for 19.6 percent. "Other" vacant units accounted for 34.5 percent of vacant units, representing a total of 596 "other" vacant units.

Table IV.26
Disposition of Vacant Housing Units
Idaho Falls
2010 Census & 2019 Five-Year ACS Data

Disposition	2010 Census		2019 Five-Year ACS	
	Units	% of Total	Units	% of Total
For Rent	862	48.6%	567	32.8%
For Sale	410	23.1%	339	19.6%
Rented Not Occupied	24	1.4%	95	5.5%
Sold Not Occupied	63	3.6%	0	0.0%
For Seasonal, Recreational, or Occasional Use	157	8.9%	131	7.6%
For Migrant Workers	5	0.3%	0	0.0%
Other Vacant	253	14.3%	596	34.5%
Total	**1,774**	**100.0%**	**1,728**	**100.0%**

Table IV.27, below, shows the number of households in the city by number of bedrooms and tenure. There were 425 rental households with no bedrooms, otherwise known as studio apartments. Two-bedroom households accounted for 24.6 percent of total households in Idaho Falls. In Idaho Falls the 6,890 households with three bedrooms accounted for 28.0 percent of all households ,and there were only 4,233 five-bedroom or more households, which accounted for 17.2 percent of all households.

Table IV.27
Households by Number of Bedrooms
Idaho Falls
2019 Five-Year ACS Data

Number of Bedrooms	Tenure			% of Total
	Own	Rent	Total	
None	95	425	620	2.5
One	148	1,618	2,067	8.4
Two	1,902	3,575	6,044	24.6
Three	4,688	1,673	6,890	28.0
Four	3,941	706	4,763	19.3
Five or more	3,668	450	4,233	17.2
Total	**14,442**	**8,447**	**24,617**	**100.0**

The age of a structure influences its value. As shown in Table IV.28, structures built in 1939 or earlier had a median value of, 141,900 while structures built between 1950 and 1959 had a median value of 130,600 and those built between 1990 to 1999 had a median value of 198,500. The newest structures tended to have the highest values and those built between 2010 and 2013 and from 2014 or later had median values of 297,900 and, 328,000 respectively. The total median value in Idaho Falls was, 164,500.

Table IV.28
Owner Occupied Median Value by Year Structure Built
Idaho Falls
2019 Five-Year ACS Data

Year Structure Built	Median Value
1939 or earlier	141,900
1940 to 1949	125,300
1950 to 1959	130,600
1960 to 1969	146,300
1970 to 1979	152,400
1980 to 1989	181,900
1990 to 1999	198,500
2000 to 2009	268,000
2010 to 2013	297,900
2014 or later	328,000
Median Value	**164,500**

Household mortgage status is reported in Table IV.29. In, Idaho Falls households with a mortgage accounted for 65.3 percent of all households or 9,434 housing units, and the remaining 57.5 percent or 8,301 units had no mortgage. Of those units with a mortgage, 1,120 had either a second mortgage or home equity loan, 13 had both a second mortgage and home equity loan, and 8,301 or 57.5 percent had no second mortgage or no home equity loan.

Table IV.29 Mortgage Status Idaho Falls 2019 Five-Year ACS Data		
Mortgage Status	**Idaho Falls**	
	Households	**% of Households**
Housing units with a mortgage, contract to purchase, or similar debt	9,434	65.3
With either a second mortgage or home equity loan, but not both	1,120	7.8
Second mortgage only	299	2.1
Home equity loan only	821	5.7
Both second mortgage and home equity loan	13	0.1
No second mortgage and no home equity loan	8,301	57.5
Housing units without a mortgage	5,008	34.7
Total	**14,442**	**100.0%**

Table IV.30 lists Idaho Falls median rent as $638 and the median home value as $164,500 in 2019. However, this data does not reflect the current market and is undervalued in the 2021 current market prices.

Table IV.30 Median Rent Idaho Falls 2019 Five-Year ACS Data	
Place	**Rent**
Median Rent	$638
Median Home Value	$164,500

Summary

Single-family units account for an estimated 71.4percent of units in the City, while apartment units account for 12.5 percent. An estimated 26.0 percent of housing units were built in the 1970's, representing the largest age group in the housing stock. Some 16.2 percent of units have been built since 2000. The proportion of vacant units has not changed significantly since 2010. However, "other vacant" units, or those not available to the marketplace, have increased to represent 34.5 percent of vacant units. An estimated 65.3 percent of owner-occupied households currently have a mortgage, and 34.7 percent do not.

B. SEGREGATION AND INTEGRATION

The "dissimilarity index" provides a quantitative measure of segregation in an area, based on the demographic composition of smaller geographic units within that area. One way of understanding the index is that it indicates how evenly two demographic groups are distributed throughout an area: if the composition of both groups in each geographic unit (e.g., Census tract) is the same as in the area as a whole (e.g., city), then the dissimilarity index score for that city will be 0. By contrast; and again, using Census tracts as an example; if one population is clustered entirely within one Census tract, the dissimilarity index score for the city will be 1. The higher the dissimilarity index value, the higher the level of segregation in an area.

A Technical Note on the Dissimilarity Index Methodology

The dissimilarity indices included in this study were calculated from data provided by the Census Bureau according to the following formula:

$$\mathrm{D}_j^{WB} = 100 * \frac{1}{2} \sum_{i=1}^{N} \left| \frac{W_i}{W_j} - \frac{B_i}{B_j} \right|$$

Where *i* indexes a geographic unit, *j* is the jth jurisdiction, *W* is group one and *B* is group two, and *N* is the number of geographic units, starting with *i,* in jurisdiction j.[11]

This is the formula that HUD uses to calculate dissimilarity index values. In most respects (including the use of tract-level data available through the Brown Longitudinal Tract Database), the methodology employed in this study exactly duplicates HUD's methodology for calculating the index of dissimilarity.

The principle exception was the decision to use Census tract-level data to calculate dissimilarity index values through 2010. While HUD uses tract level data in 1990 and 2000, HUD uses block group-level data in 2010. The decision to use tract-level data in all years included in this study was motivated by the fact that the dissimilarity index is sensitive to the geographic base unit from which it is calculated. Concretely, use of smaller geographic units produces dissimilarity index values that tend to be higher than those calculated from larger geographic units.[12]

As a general rule, HUD considers the thresholds appearing in the table below to indicate low, moderate, and high levels of segregation:

Interpreting the dissimilarity index		
Measure	**Values**	**Description**
Dissimilarity Index	<40	Low Segregation
[range 0-100]	40-54	Moderate Segregation
	>55	High Segregation

---

[11] Affirmatively Furthering Fair Housing Data Documentation. HUD. December 2015.
[12] Wong, David S. "Spatial Decomposition of Segregation Indices: A Framework Toward Measuring Segregation at Multiple Levels." Geographical Analyses, 35:3. The Ohio State University. July 2003. P. 179.

Segregation Levels

Diagram IV.5 shows the dissimilarity index by racial type in 2010 and 2019 in Idaho Falls. In 2019, black and Native Hawaiian households had high levels of segregation. However, these racial groups represent a small percentage of the population, at less than one percent each of the overall population.

Diagram IV.5
Dissimilarity Index
City of Idaho Falls
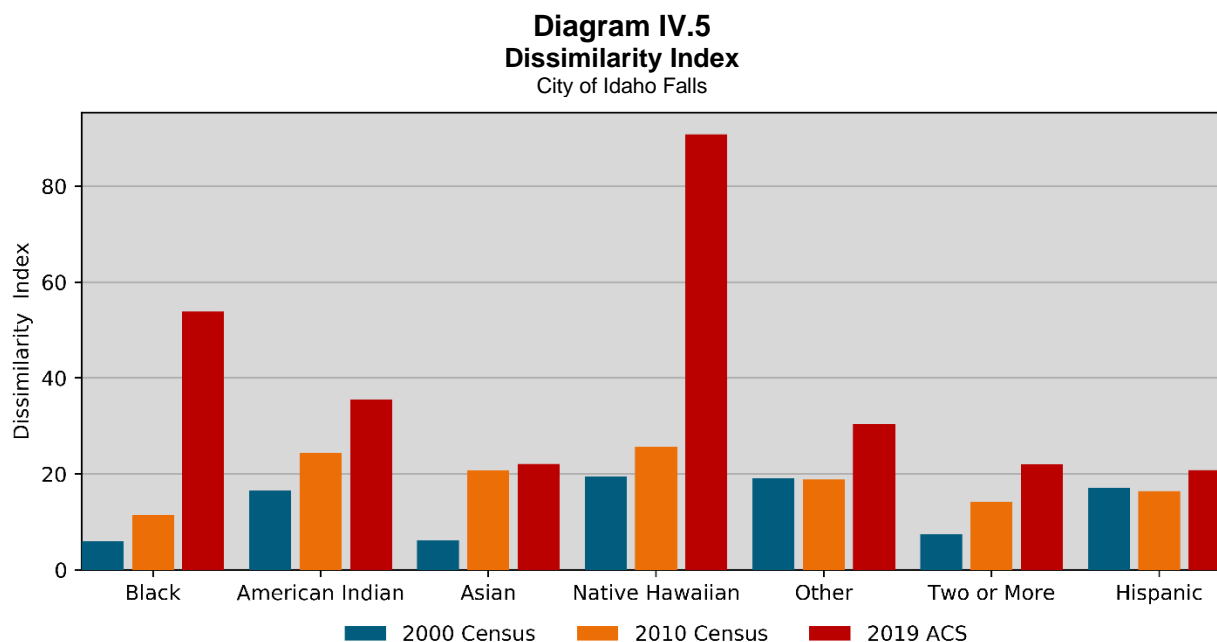
C. RACIALLY OR ETHNICALLY CONCENTRATED AREAS OF POVERTY

Racially or ethnically concentrated areas of poverty (R/ECAPs) are Census tracts with relatively high concentrations of non-white residents living in poverty. Formally, an area is designated an R/ECAP if two conditions are satisfied: first, the non-white population, whether Hispanic or non-Hispanic, must account for at least 50 percent of the Census tract population. Second, the poverty rate in that Census must exceed a certain threshold, at 40 percent.

R/ECAPs

There were no R/ECAPs in Idaho Falls in either 2010 or 2020.

D. DISPARITIES IN ACCESS TO OPPORTUNITY

The following section describes the HUD defined terms of Access to Opportunity. These measures, as outlined below, describe a set of conditions that may or may not accurately reflect the actual conditions in the study area. These data are supplemented by local data when available and ultimately provide only a piece of the total understanding of access to the various opportunities in the community. They are used as measured to compare geographic trends and levels of access within the community.

Areas of opportunity are physical places, areas within communities that provide things one needs to thrive, including quality employment, well performing schools, affordable housing, efficient public transportation, safe streets, essential services, adequate parks, and full-service grocery stores. Areas lacking opportunity, then, have the opposite of these attributes. Disparities in access to opportunity inspects whether a select group, or certain groups, have lower or higher levels of access to these community assets. HUD expresses several of these community assets through the use of an index value, with 100 representing total access by all members of the community, and zero representing no access.

The HUD opportunity indices are access to Low Poverty areas; access to School Proficiency; characterization of the Labor Market Engagement; residence in relation to Jobs Proximity; Low Transportation Costs; Transit Trips Index; and a characterization of where you live by an Environmental Health indicator. For each of these a more formal definition is as follows:

➢ Low Poverty – A measure of the degree of poverty in a neighborhood, at the Census tract level.

➢ School Proficiency - School-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing schools.

➢ Jobs Proximity - Quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a Core Based Statistical Area (CBSA)

➢ Labor Market Engagement - Provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood

➢ Low Transportation Cost – Estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region

➢ Transit Trips - Trips taken by a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters

➢ Environmental Health - summarizes potential exposure to harmful toxins at a neighborhood level

All the indices are presented in Diagram IV.6 for the City of Idaho Falls. As seen therein, Native American and Hispanic households have a lower access to labor market engagement than white households. Access to low poverty areas, proficient schools, transit trips, transportation costs, job proximity and environmental health indices are fairly even across all racial and ethnic groups.

Diagram IV.6
Access to Opportunity
City of Idaho Falls
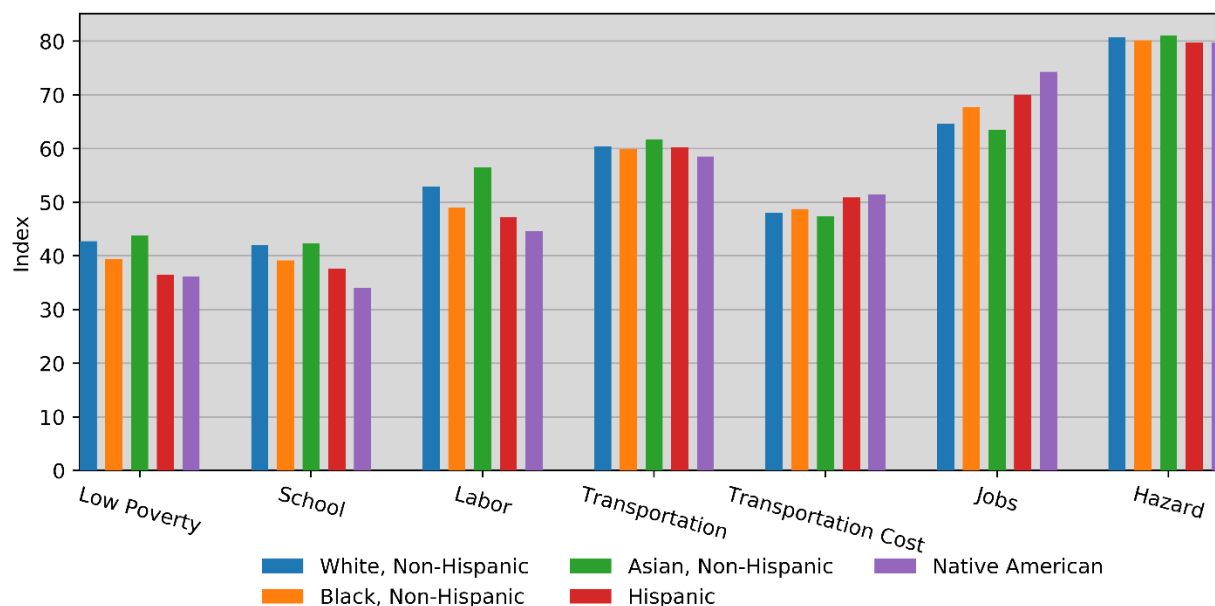
LOW POVERTY INDEX

The Low Poverty Index uses rates of family poverty by household (based on the federal poverty line) to measure exposure to poverty by neighborhood. A higher score is more desirable, generally indicating less exposure to poverty at the neighborhood level.

The lowest scores were found in the central City, while the highest scores are found in the southern and northern outskirts of Idaho Falls. There is not much variation in access to low poverty areas by race and ethnicity, although Hispanic and Native American households have a somewhat lower level of access.

Map IV.1
Low Poverty
Idaho Falls
HUD AFFH Database

LEGEND

Low Poverty Index

A higher Low Poverty Index indicates
less exposure to poverty.

	14 - 18
	19 - 25
	26 - 49
	50 - 61
	62 - 82

Idaho Falls Boundary

2010 Census Tract

Airport

Data Sources: HUD AFFH Assessment Tool 07/2020, 2010 U.S. Census, 2021 TIGER/Line Data, Esri
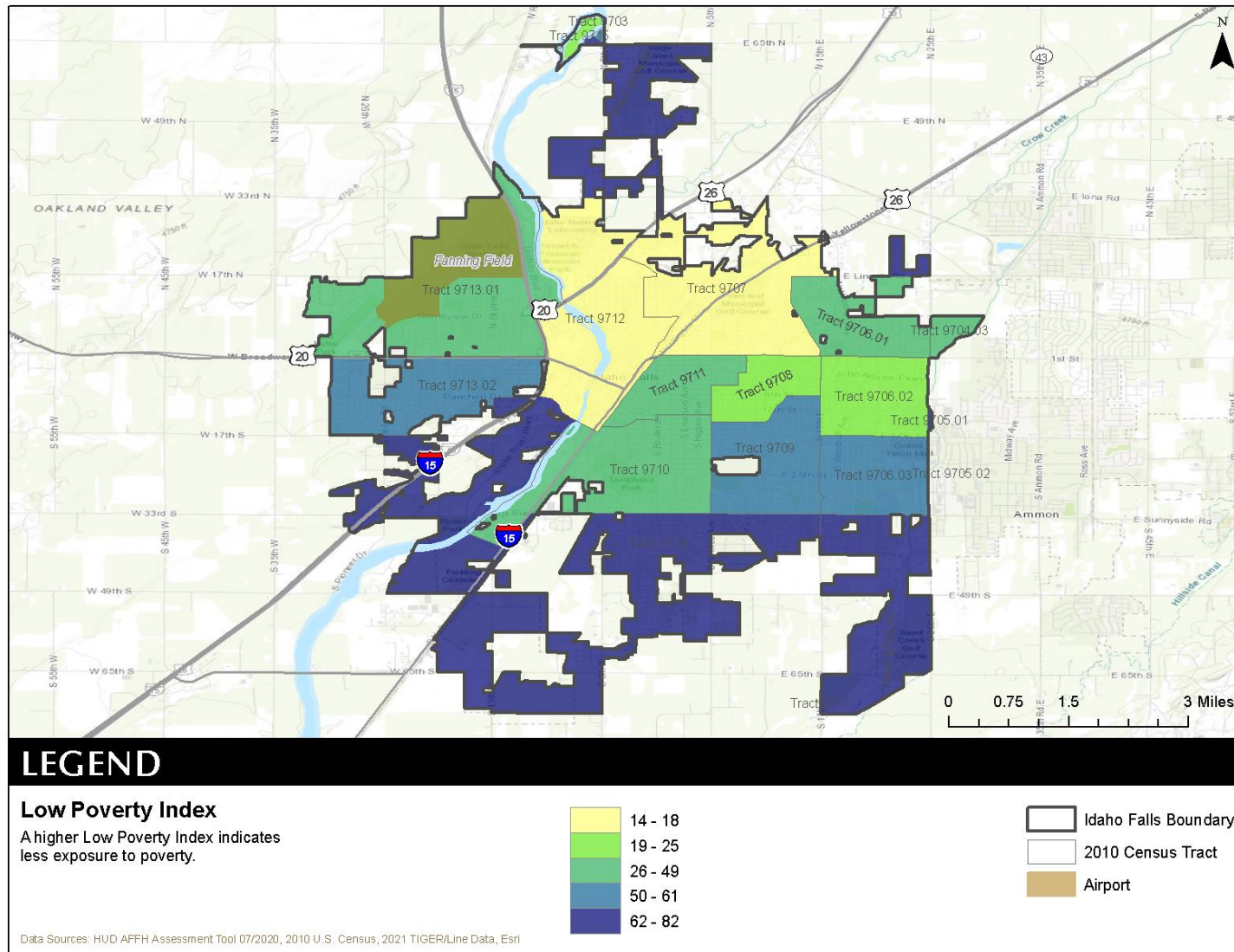
SCHOOL PROFICIENCY INDEX

The School Proficiency Index measures the proficiency of elementary schools in the attendance area (where this information is available) of individuals sharing a protected characteristic or the proficiency of elementary schools within 1.5 miles of individuals with a protected characteristic where attendance boundary data are not available. The values for the School Proficiency Index are determined by the performance of 4th grade students on state exams.

School Proficiency indices are highest outside the central area of the City, and lowest in Tracts 9712 and 9706.03 and 9705.02.

JOBS PROXIMITY INDEX

The Jobs Proximity Index measures the physical distances between place of residence and jobs by race/ethnicity and is shown in Map IV.3. Job proximity varied widely across the City. As one would expect, the areas closest to the city center had the highest job proximity index ratings.

LABOR MARKET ENGAGEMENT INDEX

The Labor Market Engagement Index provides a measure of unemployment rate, labor-force participation rate, and percent of the population ages 25 and above with at least a bachelor's degree, by neighborhood Map IV.4 shows the labor market engagement for Idaho Falls. Areas in eastern Idaho Falls had the highest rate of labor market engagement, above 70 index ratings. Areas in the central City had the lowest labor market engagement index ratings, with index ratings below 35.

Geographic location did seem to correspond with greater access to jobs and labor market engagement. In addition, Native American and Hispanic populations have lower access to labor market engagement in the City.

Map IV.2
School Proficiency
Idaho Falls
HUD AFFH Database

LEGEND

School Proficiency Index

A higher School Proficiency Index indicates
a higher quality school system.

Note: The School Proficiency Index has been calculated using
the median of each tract's block groups.

Data Sources: HUD AFFH Assessment Tool 07/2020, 2010 U.S. Census, 2021 TIGER/Line Data, Esri

	22 - 23
	24 - 44
	45 - 58
	59 - 71
	72 - 99

	Idaho Falls Boundary
	2010 Census Tract
	Airport
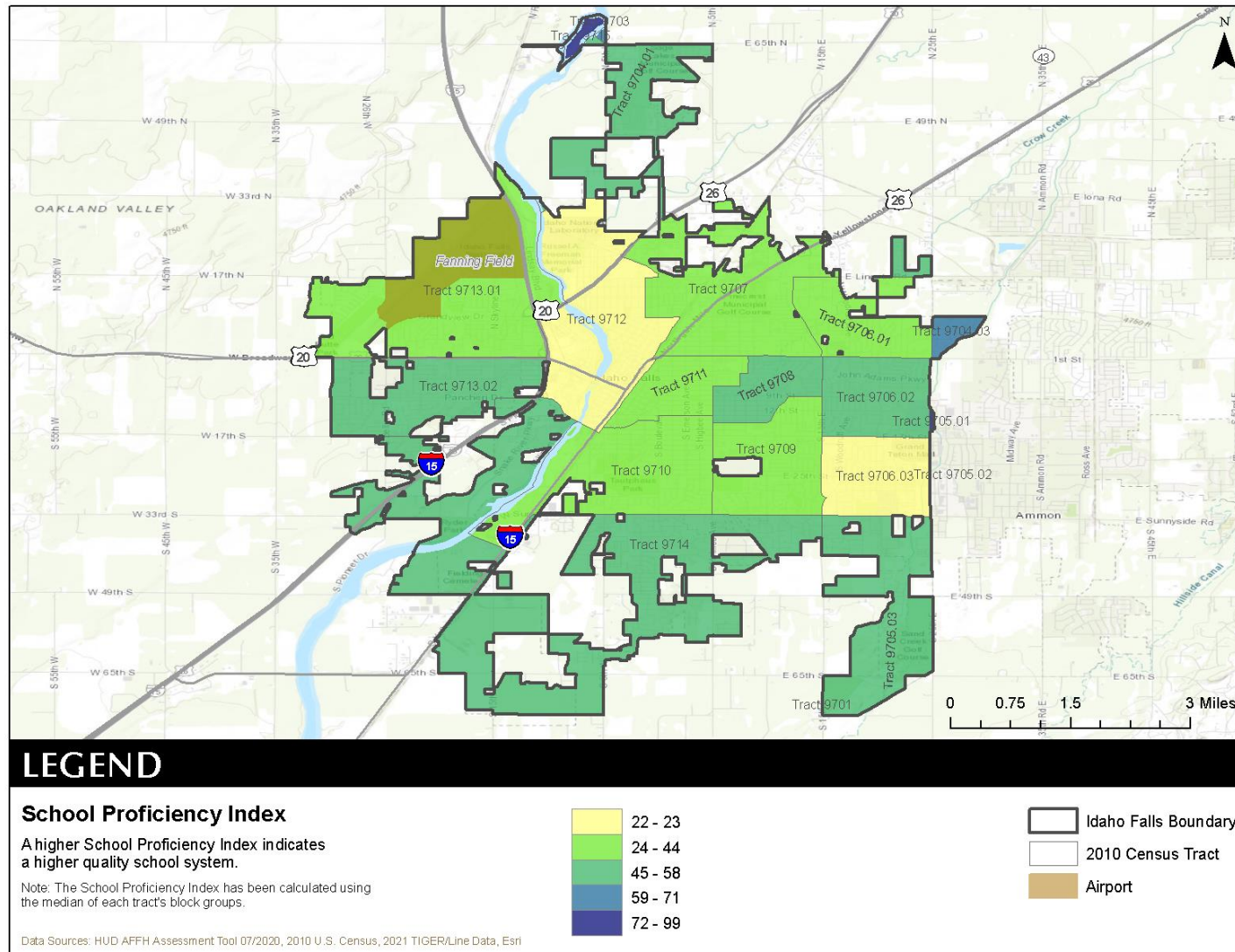
Map IV.3
Job Proximity
Idaho Falls
HUD AFFH Database

LEGEND

Jobs Proximity Index

A higher Jobs Proximity Index indicates greater access to jobs.

Note: The Jobs Proximity Index has been calculated using the median of each tract's block groups.

Data Sources: HUD AFFH Assessment Tool 07/2020, 2010 U.S. Census, 2021 TIGER/Line Data, Esri

▨	17 - 31
▨	32 - 53
▨	54 - 66
▨	67 - 79
▨	80 - 95

▢	Idaho Falls Boundary
▢	2010 Census Tract
▨	Airport
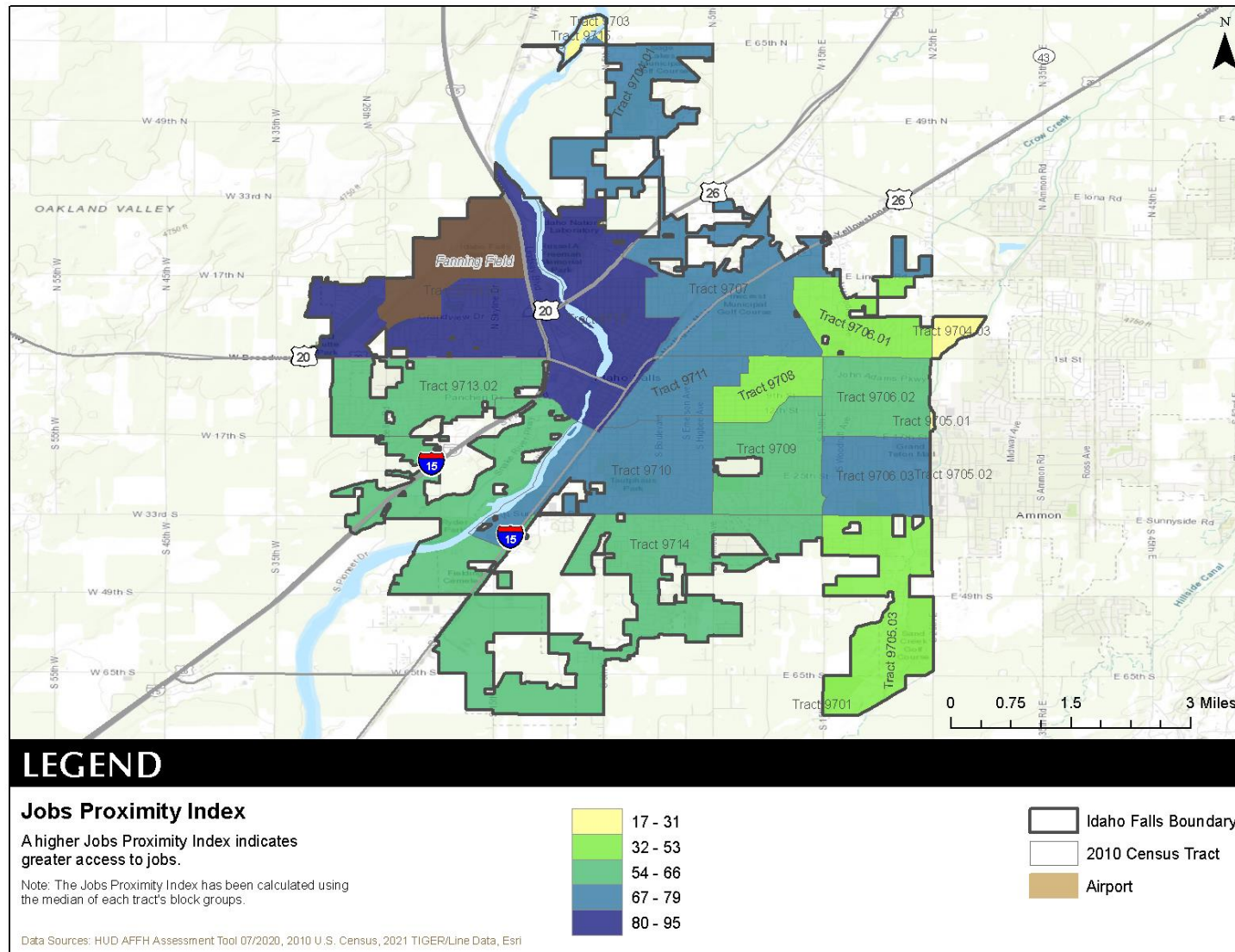
Map IV.4
Labor Market Engagement
Idaho Falls
HUD AFFH Database

LEGEND

Labor Market Engagement Index

A higher Labor Market Engagement Index indicates greater labor market engagement.

12 - 35	
36 - 51	
52 - 61	
62 - 69	
70 - 81	

Idaho Falls Boundary

2010 Census Tract

Airport

Data Sources: HUD AFFH Assessment Tool 07/2020, 2010 U.S. Census, 2021 TIGER/Line Data, Esri
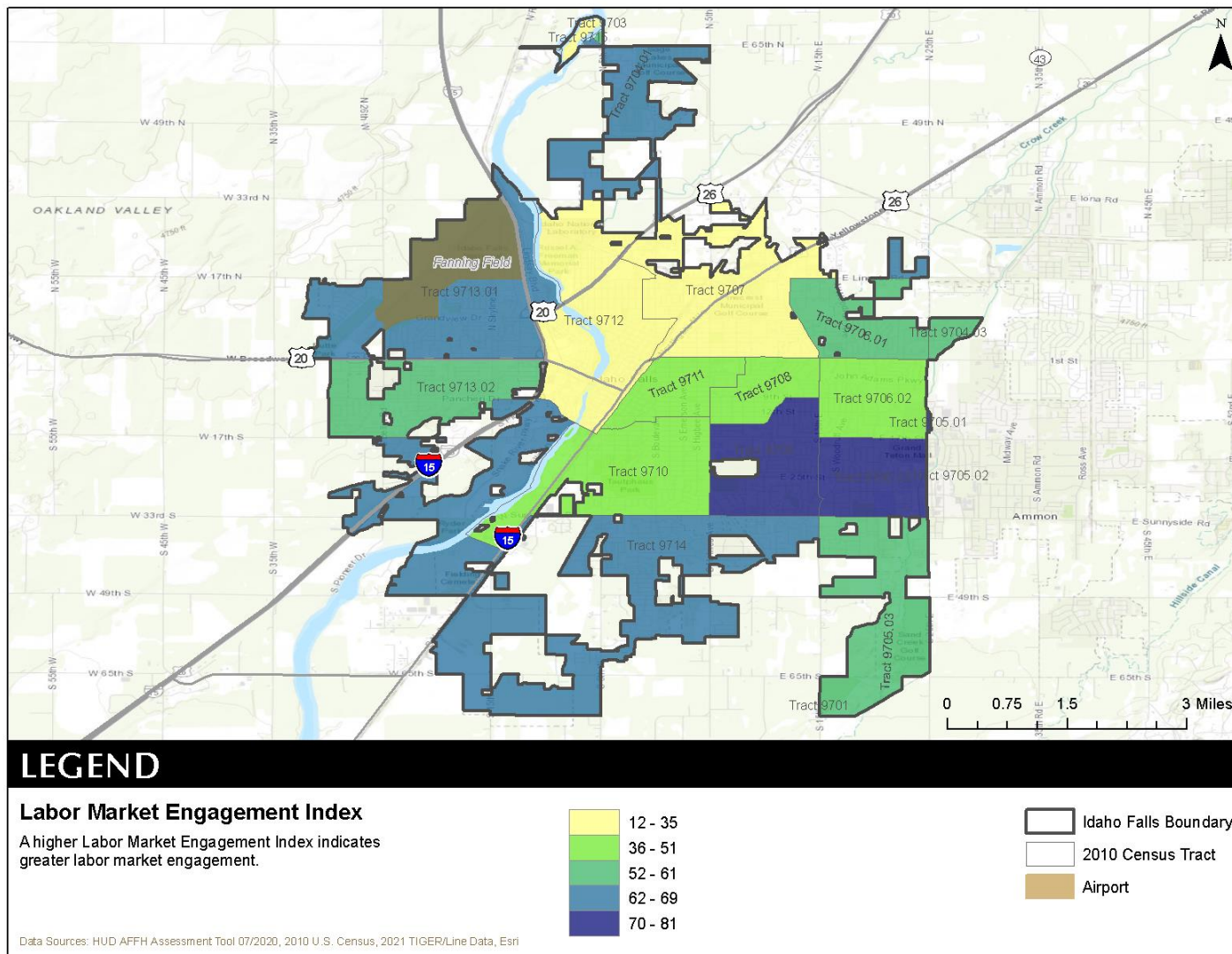
TRANSPORTATION TRIP INDEX

The Transportation Trip Index measures proximity to public transportation by neighborhood. There was little difference in index rating across racial and ethnic groups. The Transportation Transit Trips Index measures how often low-income families in a neighborhood use public transportation. The highest rate of transit trips were in areas in the southern and eastern City.

LOW TRANSPORTATION COST INDEX

The Low Transportation Cost Index measures cost of transport by neighborhood. The highest transportation cost index ratings were in the central and eastern portions of Idaho Falls, and lowest in southern Idaho Falls.

ENVIRONMENTAL HEALTH INDEX

The Environmental Health Index measures exposure based on EPA estimates of air quality carcinogenic, respiratory, and neurological toxins by neighborhood.

The Environmental Health Index varied widely in the City, with the areas in the central city seeing the lowest ratings, and areas on the outskirts with the highest.

PATTERNS IN DISPARITIES IN ACCESS TO OPPORTUNITY

The degree to which residents had access to labor market engagement differed depending on their race or ethnicity, particularly resulting in lower index ratings for Native American and Hispanic households in the City of Idaho Falls. Other measures of opportunity (low poverty, school proficiency, job proximity, use of public transit, transportation costs, and environmental quality) did not differ dramatically by race or ethnicity.

Map IV.5
Transit Trips
Idaho Falls
HUD AFFH Database

LEGEND

Transit Trips Index

A higher Transit Trips Index indicates
a greater likelihood of transit use.

38 - 45	
46 - 51	
52 - 56	
57 - 67	
68 - 75	

Idaho Falls Boundary
2010 Census Tract
Airport

Data Sources: HUD AFFH Assessment Tool 07/2020, 2010 U.S. Census, 2021 TIGER/Line Data, Esri
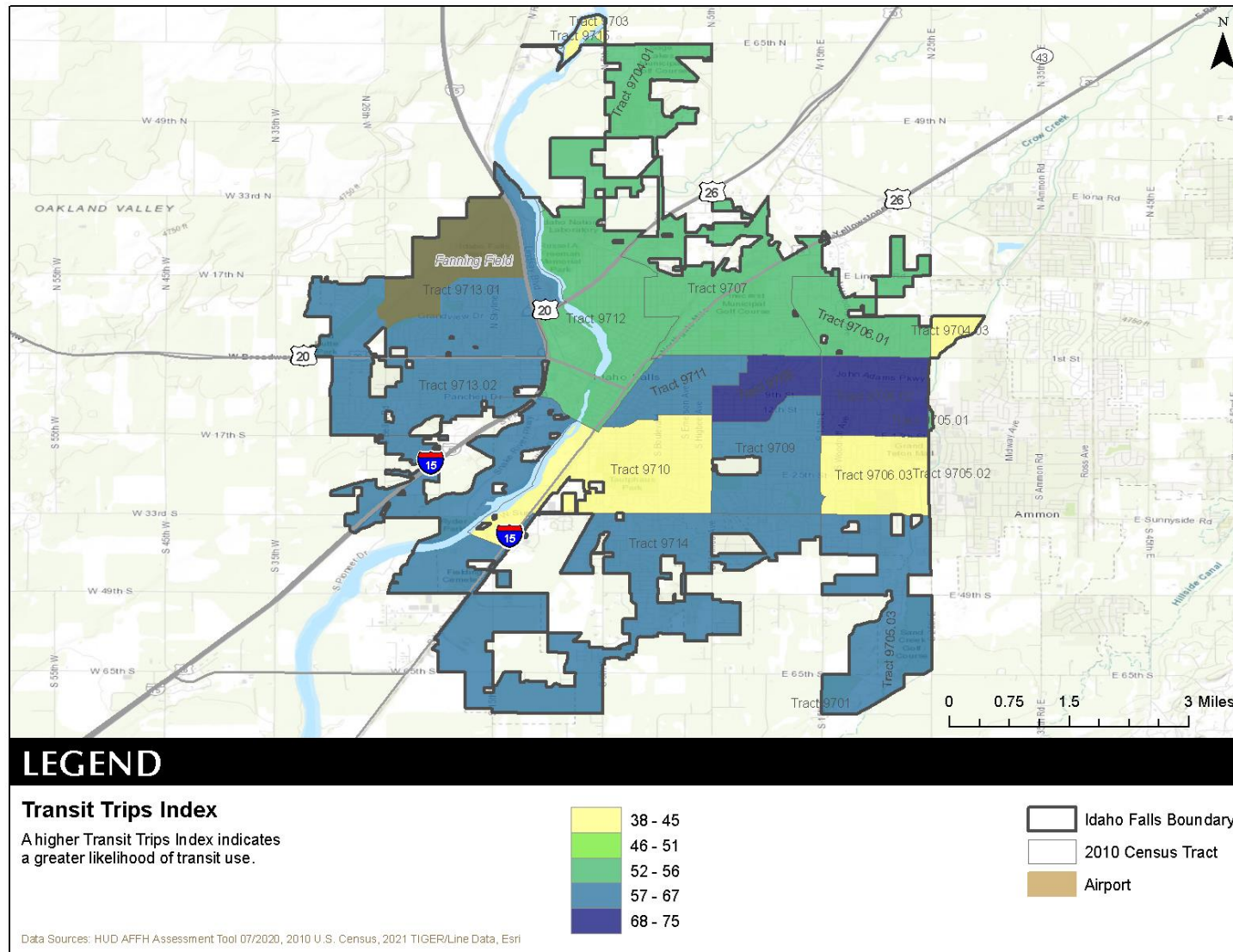
Map IV.6
Transportation Cost
Idaho Falls
HUD AFFH Database

LEGEND

Low Transportation Cost Index

A higher Low Transportation Cost Index indicates lower transportation costs.

15 - 23	
24 - 35	
36 - 45	
46 - 51	
52 - 67	

Idaho Falls Boundary
2010 Census Tract
Airport

Data Sources: HUD AFFH Assessment Tool 07/2020, 2010 U.S. Census, 2021 TIGER/Line Data, Esri
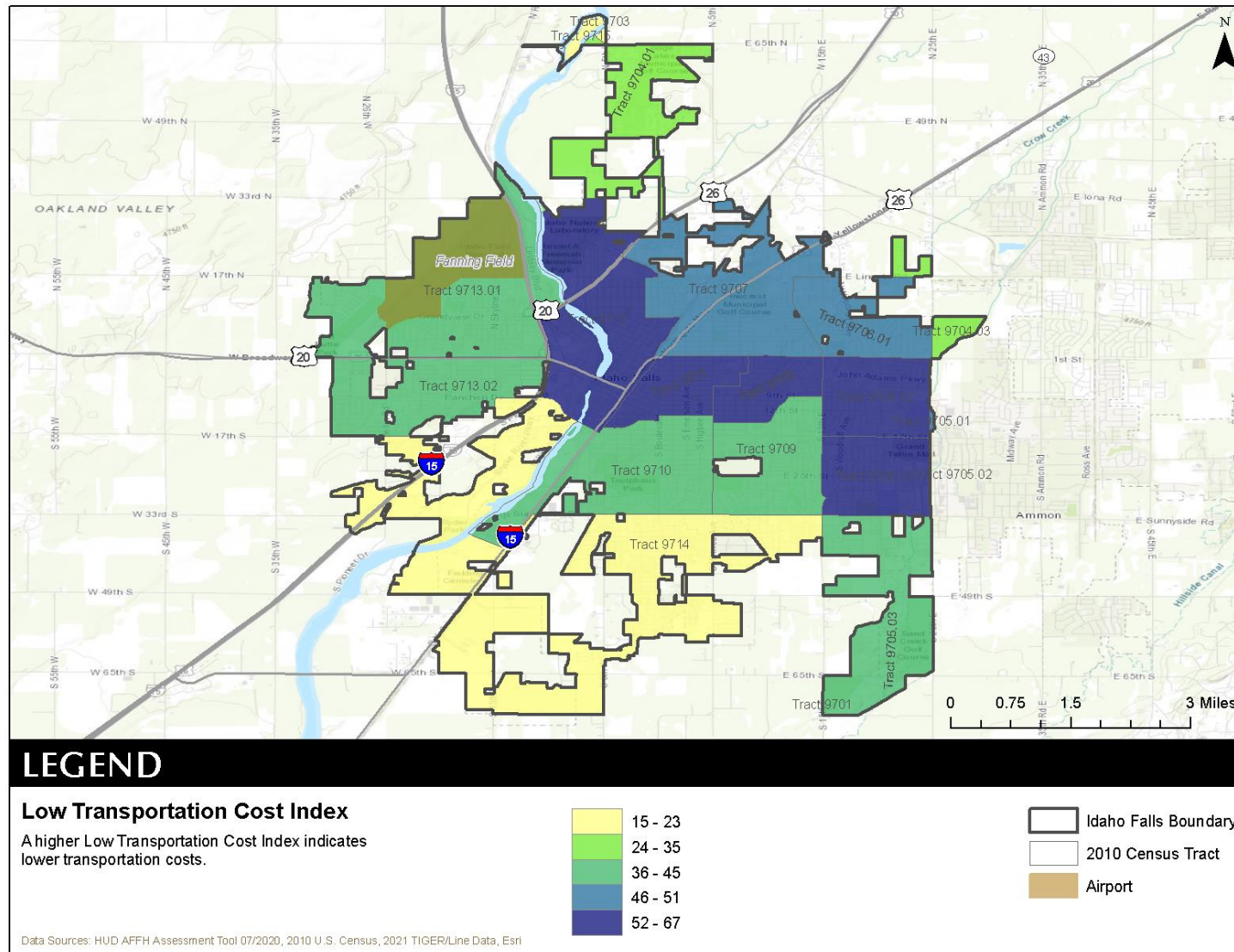
Map IV.7
Environmental Health
Idaho Falls
HUD AFFH Database

LEGEND

Environmental Health Index

A higher Environmental Health Index indicates
less exposure to toxins harmful to human health.

	76 - 78
	79 - 80
	81 - 84
	85 - 86
	87 - 98

	Idaho Falls Boundary
	2010 Census Tract
	Airport

Data Sources: HUD AFFH Assessment Tool 07/2020, 2010 U.S. Census, 2021 TIGER/Line Data, Esri
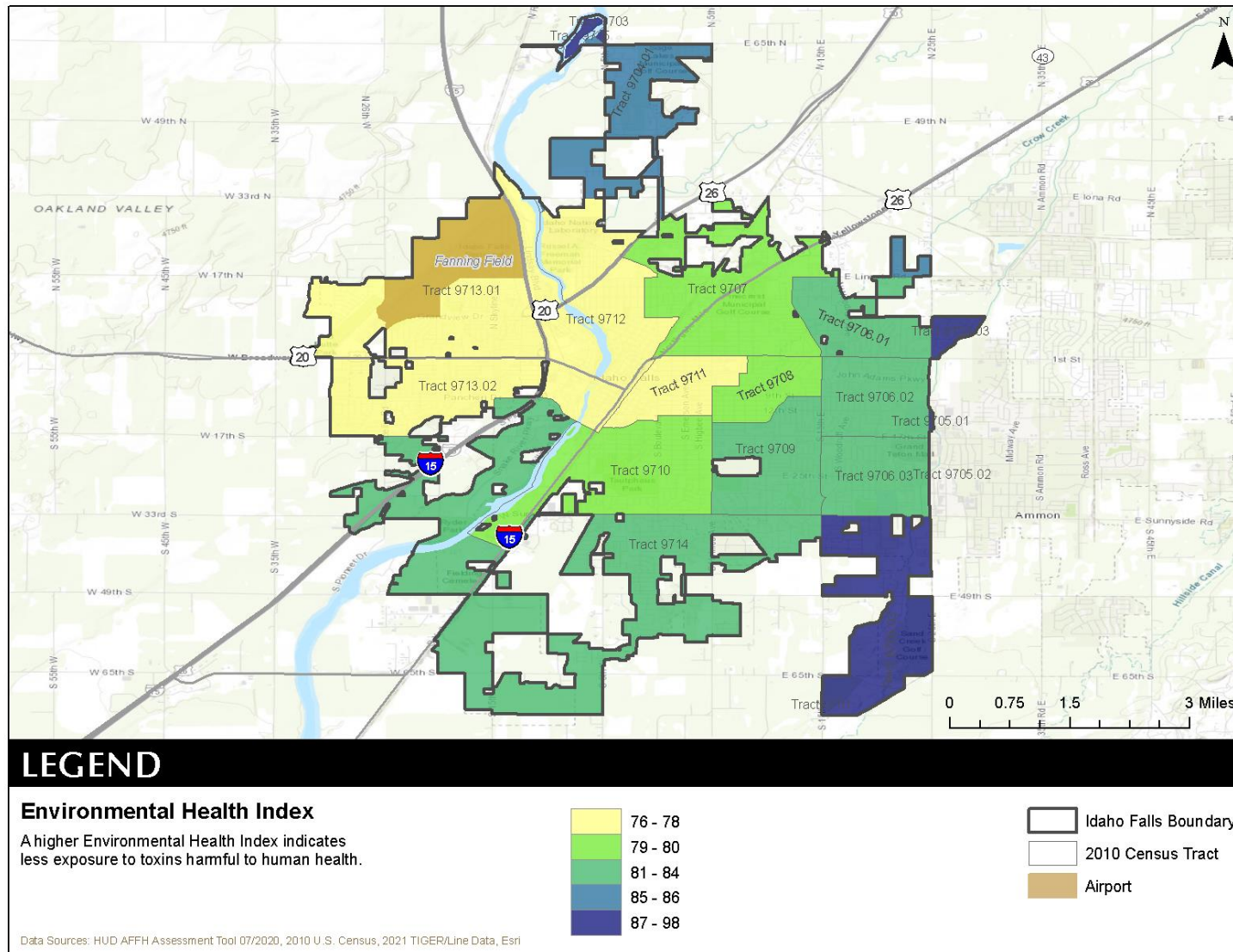
E. DISPROPORTIONATE HOUSING NEEDS

The Census Bureau collects data on several topics that HUD has identified as "housing problems." For the purposes of this report, housing problems include overcrowding, incomplete plumbing or kitchen facilities, and cost-burden.

Overcrowding

Overcrowding is defined as having from 1.1 to 1.5 people per room per residence, with severe overcrowding defined as having more than 1.5 people per room. Households with overcrowding are shown in Table IV.31. In 2019, an estimated 2.2 percent of households were overcrowded, and an additional 0.7 percent were severely overcrowded.

	No Overcrowding		Overcrowding		Severe Overcrowding		Total
Data Source	**Households**	**% of Total**	**Households**	**% of Total**	**Households**	**% of Total**	
Owner							
2010 Five-Year ACS	14,034	99.2%	119	0.8%	0	0.0%	14,153
2019 Five-Year ACS	14,215	98.4%	158	1.1%	69	0.5%	14,442
Renter							
2010 Five-Year ACS	6,443	95.7%	236	3.5%	51	0.8%	6,730
2019 Five-Year ACS	8,012	94.9%	341	4.0%	94	1.1%	8,447
Total							
2010 Five-Year ACS	20,477	98.1%	355	1.7%	51	0.2%	20,883
2019 Five-Year ACS	22,227	97.1%	499	2.2%	163	0.7%	22,889

Table IV.31
Overcrowding and Severe Overcrowding
Idaho Falls
2010 & 2019 Five-Year ACS Data

Incomplete Plumbing and Kitchen Facilities

Incomplete plumbing and kitchen facilities are another indicator of potential housing problems. According to the Census Bureau, a housing unit is classified as lacking complete plumbing facilities when any of the following are not present: piped hot and cold water, a flush toilet, and a bathtub or shower. Likewise, a unit is categorized as deficient when any of the following are missing from the kitchen: a sink with piped hot and cold water, a range or cook top and oven, and a refrigerator. This data is displayed in Table IV.32 and Table IV.33, below.

There were a total of 147 households with incomplete plumbing facilities in 2019, representing 0.6 percent of households in Idaho Falls. This is compared to 0.2 percent of households lacking complete plumbing facilities in 2010.

Households	2010 Five-Year ACS	2019 Five-Year ACS
With Complete Plumbing Facilities	20,835	22,742
Lacking Complete Plumbing Facilities	48	147
Total Households	**20,883**	**22,889**
Percent Lacking	**0.2%**	**0.6%**

Table IV.32
Households with Incomplete Plumbing Facilities
2010 and 2019 Five-Year ACS Data

There were 322 households lacking complete kitchen facilities in 2019, compared to 97 households in 2010. This was a change from 0.5 percent of households in 2010 to 1.4 percent in 2019.

Table IV.33 Households with Incomplete Kitchen Facilities Idaho Falls 2010 and 2019 Five-Year ACS Data		
Households	**2010 Five-Year ACS**	**2019 Five-Year ACS**
With Complete Kitchen Facilities	20,786	22,567
Lacking Complete Kitchen Facilities	97	322
Total Households	**20,883**	**22,889**
Percent Lacking	**0.5%**	**1.4%**

Cost Burdens

Cost burden is defined as gross housing costs that range from 30.0 to 50.0 percent of gross household income; severe cost burden is defined as gross housing costs that exceed 50.0 percent of gross household income. For homeowners, gross housing costs include property taxes, insurance, energy payments, water and sewer service, and refuse collection. If the homeowner has a mortgage, the determination also includes principal and interest payments on the mortgage loan. For renters, this figure represents monthly rent and selected electricity and natural gas energy charges.

As seen in Table IV.34, in Idaho Falls 14.9 percent of households had a cost burden and 13.0 percent had a severe cost burden. Some 22.9 percent of renters were cost burdened, and 22.8 percent were severely cost burdened. Owner-occupied households without a mortgage had a cost burden rate of 2.8 percent and a severe cost burden rate of 5.4 percent. Owner occupied households with a mortgage had a cost burden rate of 14.1 percent, and severe cost burden at 8.2 percent.

Table IV.34 Cost Burden and Severe Cost Burden by Tenure Idaho Falls 2010 & 2019 Five-Year ACS Data									
Data Source	**Less Than 30%**		**31%-50%**		**Above 50%**		**Not Computed**		**Total**
	Households	**% of Total**	**Households**	**% of Total**	**Households**	**% of Total**	**Households**	**% of Total**	
Owner With a Mortgage									
2010 ACS	7,207	73.9%	1,835	18.8%	690	7.1%	17	0.2%	9,749
2019 ACS	7,292	77.3%	1,333	14.1%	775	8.2%	34	0.4%	9,434
Owner Without a Mortgage									
2010 ACS	3,958	89.9%	241	5.5%	157	3.6%	48	1.1%	4,404
2019 ACS	4,566	91.2%	141	2.8%	270	5.4%	31	0.6%	5,008
Renter									
2010 ACS	3,156	46.9%	1,988	29.5%	1,243	18.5%	343	5.1%	6,730
2019 ACS	4,265	50.5%	1,935	22.9%	1,923	22.8%	324	3.8%	8,447
Total									
2010 ACS	14,321	68.6%	4,064	19.5%	2,090	10.0%	408	2.0%	20,883
2019 ACS	16,123	70.4%	3,409	14.9%	2,968	13.0%	389	1.7%	22,889

Comprehensive Housing Affordability Strategy (CHAS)

The following table set shows Comprehensive Housing Affordability Strategy (CHAS) data.

Each year, the U.S. Department of Housing and Urban Development (HUD) receives custom tabulations of American Community Survey (ACS) data from the U.S. Census Bureau. These data, known as the "CHAS" data (Comprehensive Housing Affordability Strategy), demonstrate the extent of housing problems and housing needs, particularly for low income households. The CHAS data are used by local governments to plan how to spend HUD funds, and may also be used by HUD to distribute grant funds.

To make this dataset more accessible to the average user the income brackets were replaced with actual Median Family Income (MFI). Below is a table show in the MFI breakdown:

Income Brackets	Actual Income
0 - 30% MFI	$0 to $21,750
30.1% - 50% MFI	$21,751 to $36,250
50.1% - 80% MFI	$36,251 to $58,000
80.1% - 100% MFI	$58,001 to $72,500
100% + MFI	Above $72,500

Housing Problems by Income, Race, and Tenure

Table IV.35 shows households with housing problems by race/ethnicity. This table can be used to determine if there is a disproportionate housing need for any racial or ethnic groups. If any racial/ethnic group faces housing problems at a rate of ten percentage points or high than the jurisdiction average, then they have a disproportionate share of housing problems. Housing problems are defined as any household that has overcrowding, inadequate kitchen or plumbing facilities, or are cost burdened (pay more than 30 percent of their income on housing). In Idaho Falls there are 5,125 white households with housing problems and 799 Hispanic households with housing problems.

The overall rate of housing problems in Idaho Falls is 28.1 percent, according to CHAS data. Asian, American Indian, Pacific Islander, and Hispanic households experience housing problems at a disproportionate rate overall. However, this represents 16 Asian households, 55 American Indian households, and 10 Pacific Islander households and, therefore, may not be statistically significant. For Hispanic households, however, this represents 41.4 percent of households that experience housing problems.

Table IV.35
Total Households with Housing Problems by Income and Race
Idaho Falls
2013–2017 HUD CHAS Data

Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With Housing Problems								
$0 to $21,750	1,775	25	4	0	0	10	165	1,979
$21,751 to $36,250	1,695	0	4	0	10	30	195	1,934
$36,251 to $58,000	1,030	4	4	55	0	14	395	1,502
$58,001 to $72,500	300	0	4	0	0	10	24	338
Above $72,500	325	0	0	0	0	0	20	345
Total	**5,125**	**29**	**16**	**55**	**10**	**64**	**799**	**6,098**
Without Housing Problems								
$0 to $21,750	250	40	0	0	0	0	30	320
$21,751 to $36,250	705	0	0	0	0	0	75	780
$36,251 to $58,000	2,490	25	10	0	0	35	230	2,790
$58,001 to $72,500	1,590	0	35	14	0	30	280	1,949
Above $72,500	8,740	65	190	20	0	125	500	9,640
Total	**13,775**	**130**	**235**	**34**	**0**	**190**	**1,115**	**15,479**
Not Computed								
$0 to $21,750	120	0	10	0	0	0	15	145
$21,751 to $36,250	0	0	0	0	0	0	0	0
$36,251 to $58,000	0	0	0	0	0	0	0	0
$58,001 to $72,500	0	0	0	0	0	0	0	0
Above $72,500	0	0	0	0	0	0	0	0
Total	**120**	**0**	**10**	**0**	**0**	**0**	**15**	**145**
Total								
$0 to $21,750	2,145	65	14	0	0	10	210	2,444
$21,751 to $36,250	2,400	0	4	0	10	30	270	2,714
$36,251 to $58,000	3,520	29	14	55	0	49	625	4,292
$58,001 to $72,500	1,890	0	39	14	0	40	304	2,287
Above $72,500	9,065	65	190	20	0	125	520	9,985
Total	**19,020**	**159**	**261**	**89**	**10**	**254**	**1,929**	**21,722**

Housing Problems by Geographic Location

The geographic distribution of housing problems is shown in Map IV.12, on the following page. Housing problems were most heavily concentrated in the city center and one census tract in the eastern city. These are in census tracts 9711, 9712, and 9706.02.

Map IV.8
Housing Problems
Idaho Falls
HUD AFFH Database
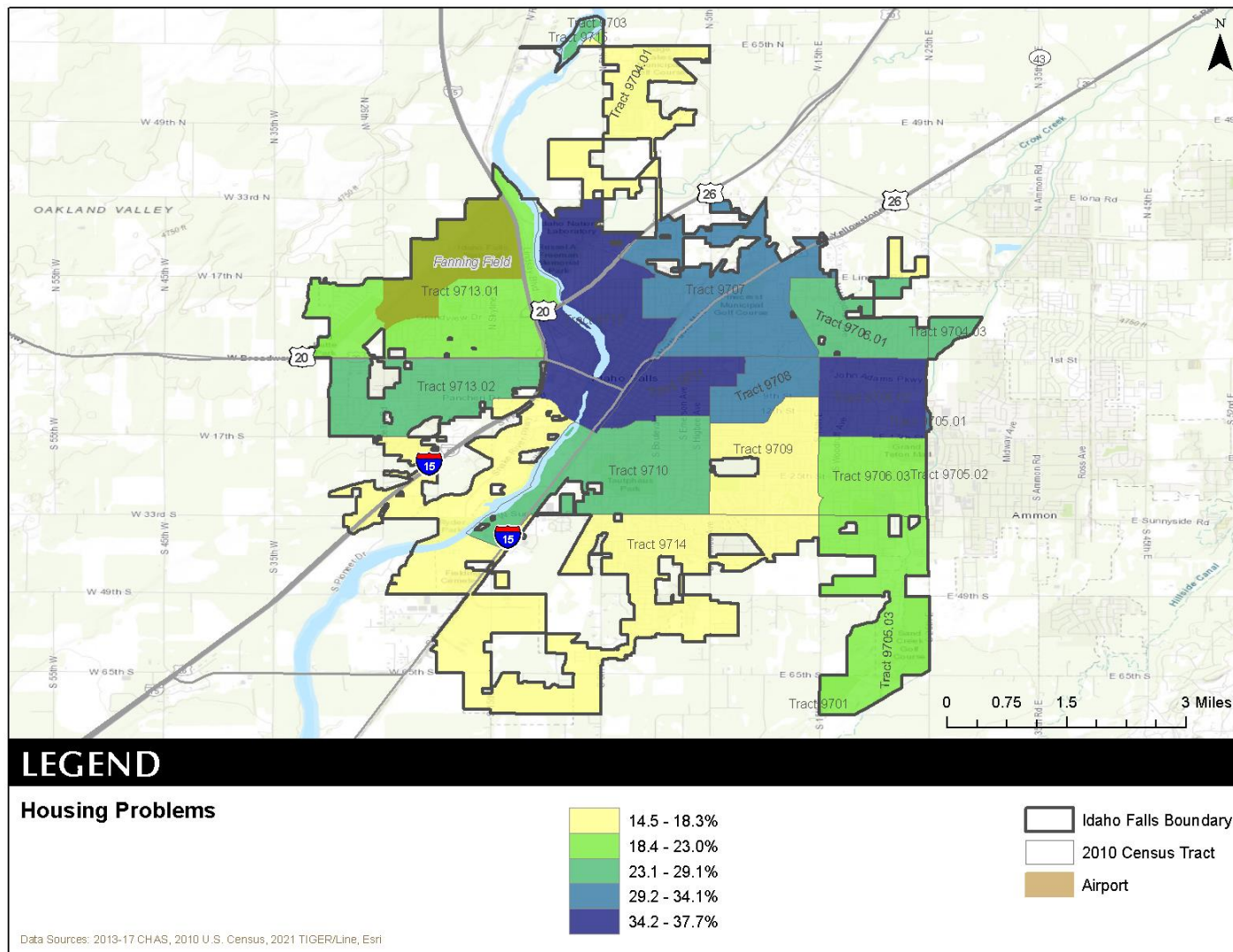
ACCESS TO MORTGAGE FINANCE SERVICES

Congress enacted the Home Mortgage Disclosure Act in 1975, permanently authorizing the law in 1988[13]. The Act requires both depository and non-depository lenders to collect and publicly disclose information about housing-related applications and loans. Under the HMDA, financial institutions are required to report the race, ethnicity, sex, loan amount, and income of mortgage applicants and borrowers by Census tract. Institutions must meet a set of reporting criteria. For depository institutions, these are as follows:

1. The institution must be a bank, credit union, or savings association;
2. The total assets must exceed the coverage threshold;[14]
3. The institution must have had a home or branch office in a Metropolitan Statistical Area (MSA);
4. The institution must have originated or refinanced at least one home purchase loan secured by a first lien on a one- to four-family dwelling;
5. The institution must be federally insured or regulated; and
6. The mortgage loan must have been insured, guaranteed, or supplemented by a federal agency or intended for sale to Fannie Mae or Freddie Mac.

For other institutions, including non-depository institutions, the reporting criteria are:

1. The institution must be a for-profit organization;
2. The institution's home purchase loan originations must equal or exceed 10 percent of the institution's total loan originations, or more than $25 million;
3. The institution must have had a home or branch office in an MSA or have received applications for, originated, or purchased five or more home purchase loans, home improvement loans, or refinancing on property located in an MSA in the preceding calendar year; and
4. The institution must have assets exceeding $10 million or have originated 100 or more home purchases in the preceding calendar year.

In addition to reporting race and ethnicity data for loan applicants, the HMDA reporting requirements were modified in response to the Predatory Lending Consumer Protection Act of 2002 as well as the Home Owner Equity Protection Act (HOEPA). Consequently, loan originations are now flagged in the data system for three additional attributes:

1. If they are HOEPA loans;
2. Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and
3. Presence of high-annual percentage rate loans (HALs), defined as more than three percentage points for purchases when contrasted with comparable treasury instruments or five percentage points for refinance loans.

For the purposes of this analysis, these flagged originations will be termed predatory, or at least predatory in nature. Overall, the data contained within the HMDA reporting guidelines represent the best and most complete set of information on home loan applications. This report includes HMDA data from 2008 through 2017, the most recent year for which these data are available.

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[13] Prior to that year, Congress had to periodically reauthorize the law.
[14] Each December, the Federal Reserve announces the threshold for the following year. The asset threshold may change from year to year based on changes in the Consumer Price Index for Urban Wage Earners and Clerical Workers.

Banks and other lending institutions handled 31,385 home purchase loans and loan applications in Idaho Falls from 2008 through 2019. As shown in Table IV.36, a majority of these loans, or over 14,871, were for refinancing. Home purchase loans represented around 45.4 percent of all loans and loan applications.

Table IV.36
Purpose of Loan by Year
Idaho Falls
2008–2019 HMDA Data

Purpose	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
Home Purchase	652	520	514	466	989	1,176	1,214	1,545	1,736	1,788	1,704	1,938	14,242
Home Improvement	231	75	53	59	129	121	138	174	153	243	305	270	1,951
Refinancing	1,271	1,381	1,017	812	2,139	1,785	856	1,139	1,343	877	698	1,553	14,871
Total	2,154	1,976	1,584	1,337	3,257	3,082	2,208	2,858	3,232	2,908	2,841	3,948	31,385

Table IV.37 shows the occupancy status for loan applicants. It is these home purchase loans, and specifically the "owner-occupied" home purchase loans that will be the focus of the following discussion, as the outcomes of owner-occupied home purchase applications provide the most direct index of the ability of prospective homeowners to choose where they will live. Around 90.1 percent of home-purchase loan applications were submitted by those who intended to live in the home that they purchased.

Table IV.37
Occupancy Status for Applications
Idaho Falls
2008–2019 HMDA Data

Status	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
Owner-Occupied	1,958	1,864	1,470	1,167	2,852	2,694	1,940	2,558	2,931	2,626	2,601	3,612	28,273
Not Owner-Occupied	191	108	113	170	402	383	268	299	301	278	48	52	2,613
Not Applicable	5	4	1	0	3	5	0	1	0	4	192	284	499
Total	2,154	1,976	1,584	1,337	3,257	3,082	2,208	2,858	3,232	2,908	2,841	3,948	31,385

Owner-occupied home purchase loan applications by loan types are shown in Table IV.38. Between 2008 and 2019, some 55.7 percent of home loan purchases were conventional loans, 35.4 percent were FHA insured, 8.5 percent were VA Guaranteed, and the remaining 0.4 percent were Rural Housing Service or Farm Service Agency.

Table IV.38
Owner-Occupied Home Purchase Loan Applications by Loan Type
Idaho Falls
2008–2019 HMDA Data

Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
Conventional	225	147	142	132	378	583	666	799	937	1,003	993	1,144	7,149
FHA - Insured	321	311	279	253	429	364	331	455	521	477	414	385	4,540
VA - Guaranteed	21	21	38	28	64	83	90	134	148	145	122	194	1,088
Rural Housing Service or Farm Service Agency	0	2	2	3	0	5	3	5	5	7	14	1	47
Total	**567**	**481**	**461**	**416**	**871**	**1,035**	**1,090**	**1,393**	**1,611**	**1,632**	**1,543**	**1,724**	**12,824**

Denial Rates

After the owner-occupied home purchase loan application is submitted, the applicant receives one of the following status designations:

- "Originated," which indicates that the loan was made by the lending institution;
- "Approved but not accepted," which notes loans approved by the lender but not accepted by the applicant;
- "Application denied by financial institution," which defines a situation wherein the loan application failed;
- "Application withdrawn by applicant," which means that the applicant closed the application process;
- "File closed for incompleteness" which indicates the loan application process was closed by the institution due to incomplete information; or
- "Loan purchased by the institution," which means that the previously originated loan was purchased on the secondary market.

As shown in Table IV.39, just over 8,048 home purchase loan applications were originated over the 2008-2019 period, and 762 were denied.

The most common reasons cited in the decision to deny one of these loan applications related to the debt-to-income ratio of the prospective homeowner, as shown in Table IV.40. Credit history and collateral were also commonly given as reasons to deny home purchase loans.

Table IV.39
Loan Applications by Action Taken
Idaho Falls
2008–2019 HMDA Data

Action	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
Loan Originated	340	240	231	195	461	606	694	933	1,093	1,106	1,047	1,102	8,048
Application Approved but not Accepted	22	8	8	12	14	13	12	42	59	53	60	68	371
Application Denied	42	33	20	16	63	92	87	80	85	88	83	73	762
Application Withdrawn by Applicant	22	26	17	18	35	40	57	76	96	105	118	164	774
File Closed for Incompleteness	1	3	1	1	7	6	4	10	7	10	9	14	73
Loan Purchased by the Institution	140	170	184	174	291	278	236	252	271	270	224	303	2,793
Preapproval Request Denied	0	1	0	0	0	0	0	0	0	0	2	0	3
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	**567**	**481**	**461**	**416**	**871**	**1,035**	**1,090**	**1,393**	**1,611**	**1,632**	**1,543**	**1,724**	**12,824**

Table IV.40
Loan Applications by Reason for Denial
Idaho Falls
2008–2019 HMDA Data

Denial Reason	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
Debt-to-Income Ratio	13	7	4	3	21	20	25	28	19	24	27	16	207
Employment History	3	0	0	2	4	5	4	0	5	4	3	6	36
Credit History	5	6	2	3	14	26	23	21	23	16	18	16	173
Collateral	4	2	3	2	3	5	5	6	14	15	6	12	77
Insufficient Cash	0	1	0	0	1	5	4	0	6	2	5	3	27
Unverifiable Information	0	1	1	1	1	4	1	4	2	0	5	7	27
Credit Application Incomplete	4	8	0	2	2	3	5	4	2	6	8	7	51
Mortgage Insurance Denied	0	0	1	0	0	0	0	0	0	0	0	0	1
Other	3	2	1	0	4	5	5	5	4	9	12	6	56
Missing	10	6	8	3	13	19	15	12	10	12	-1	0	107
Total	**42**	**33**	**20**	**16**	**63**	**92**	**87**	**80**	**85**	**88**	**83**	**73**	**762**

Denial rates were observed to differ by race and ethnicity, as shown in Table IV.41. Black and American Indian/ Native American applicant were denied at a rate of 16.2 and 14.3 percent, respectively, compared to 8.1 percent of white applicant. Hispanic applicants were denied at an average rate of 14.8 percent, compared to the 7.5 percent for non-Hispanic applicants.

Table IV.41
Denial Rates by Race/Ethnicity of Applicant
Idaho Falls
2008-2019 HMDA Data

Race/Ethnicity	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Average
American Indian	0.0%	100.0%	0.0%	0.0%	0.0%	14.3%	100.0%	10.0%	12.5%	20.0%	0.0%	14.3%	14.3%
Asian	0.0%	100.0%	%	0.0%	0.0%	50.0%	0.0%	9.1%	5.9%	13.3%	0.0%	0.0%	9.2%
Black	100.0%	16.7%	%	%	0.0%	33.3%	0.0%	0.0%	0.0%	16.7%	33.3%	12.5%	16.2%
Pacific Islander	0.0%	%	%	0.0%	%	%	50.0%	0.0%	0.0%	0.0%	0.0%	0.0%	4.8%
White	10.2%	11.2%	7.6%	7.4%	11.6%	12.0%	10.6%	7.2%	6.6%	6.7%	7.1%	5.9%	8.1%
Not Available	36.4%	14.3%	18.2%	25.0%	26.3%	33.3%	25.0%	18.2%	16.0%	16.4%	14.6%	11.6%	18.3%
Not Applicable	%	%	%	%	%	%	%	%	%	%	%	%	%
Average	**11.0%**	**12.1%**	**8.0%**	**7.6%**	**12.0%**	**13.2%**	**11.1%**	**7.9%**	**7.2%**	**7.4%**	**7.3%**	**6.2%**	**8.6%**
Hispanic	19.4%	31.2%	7.7%	18.8%	24.2%	15.7%	21.9%	20.0%	10.0%	9.0%	11.4%	11.4%	14.8%
Non-Hispanic	9.6%	10.8%	7.5%	5.2%	10.1%	12.1%	9.7%	6.4%	6.0%	6.9%	6.5%	5.3%	7.5%

There were also variations in denial rates by gender: as shown in Table IV.42, the denial rate for prospective female homeowners was 9.7 percent, more 1.9 percentage points higher than the denial rate for male applicants. However, the disparity in denial rates by gender has varied each year and some years the denial rates for males was higher than females during this period.

Table IV.42
Denial Rates by Gender of Applicant
Idaho Falls
2008–2019 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2008	10.8%	10.0%	40.0%	%	11.0%
2009	12.0%	12.2%	12.5%	%	12.1%
2010	8.7%	6.8%	0.0%	%	8.0%
2011	6.8%	8.2%	33.3%	%	7.6%
2012	11.8%	11.9%	20.0%	%	12.0%
2013	10.7%	19.3%	36.4%	%	13.2%
2014	10.5%	11.2%	38.5%	%	11.1%
2015	6.8%	9.5%	31.6%	%	7.9%
2016	6.5%	7.2%	23.1%	%	7.2%
2017	6.9%	7.3%	19.4%	%	7.4%
2018	5.8%	10.3%	17.2%	%	7.3%
2019	5.5%	7.6%	12.9%	%	6.2%
Average	**7.8%**	**9.7%**	**22.0%**	**%**	**8.6%**

Predatory Lending

In addition to modifications implemented in 2004 to correctly document loan applicants' race and ethnicity, the HMDA reporting requirements were changed in response to the Predatory Lending Consumer Protection Act of 2002 as well as the Home Owner Equity Protection Act (HOEPA). Consequently, loan originations are now flagged in the data system for three additional attributes:

1. If they are HOEPA loans;
2. Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and
3. Presence of high annual percentage rate (APR) loans (HALs), defined as more than three percentage points higher than comparable treasury rates for home purchase loans, or five percentage points higher for refinance loans.

As noted previously, home loans are designated as "high-annual percentage rate" loans (HALs) where the annual percentage rate on the loan exceeds that of a comparable treasury instruments by at least three percentage points. As shown in Table IV.43, some 110 home purchase loans issued in 2008 and after have carried high-annual percentage rates, or 1.0 percent of all owner-occupied home purchase loans issued in Idaho Falls. The rate of HALs in 2008 was 7.6 percent, however, but has fallen dramatically to 0.0 percent in 2010 and 2011. Since 2015, there has been a slight increase in HAL rates, up to 1.7 percent in 2017. However, this is still substantially lower than HAL rates prior to the Great Recession.

Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
Table IV.43 Originated Owner-Occupied Loans by HAL Status Idaho Falls 2008–2019 HMDA Data													
HAL	26	12	0	0	1	2	8	13	3	19	68	3	155
Other	314	228	231	195	460	604	686	920	1090	1087	979	1099	7893
Total	**340**	**240**	**231**	**195**	**461**	**606**	**694**	**933**	**1,093**	**1,106**	**1,047**	**1,102**	**8,048**
Percent HAL	7.6%	5.0%	0.0%	0.0%	0.2%	0.3%	1.2%	1.4%	0.3%	1.7%	6.5%	0.3%	1.9%

F. PUBLICLY SUPPORTED HOUSING ANALYSIS

There are a variety of types and locations of public housing units within the City of Idaho Falls. According to HUD's AFFH data, there are 631 total publicly supported units in the City.
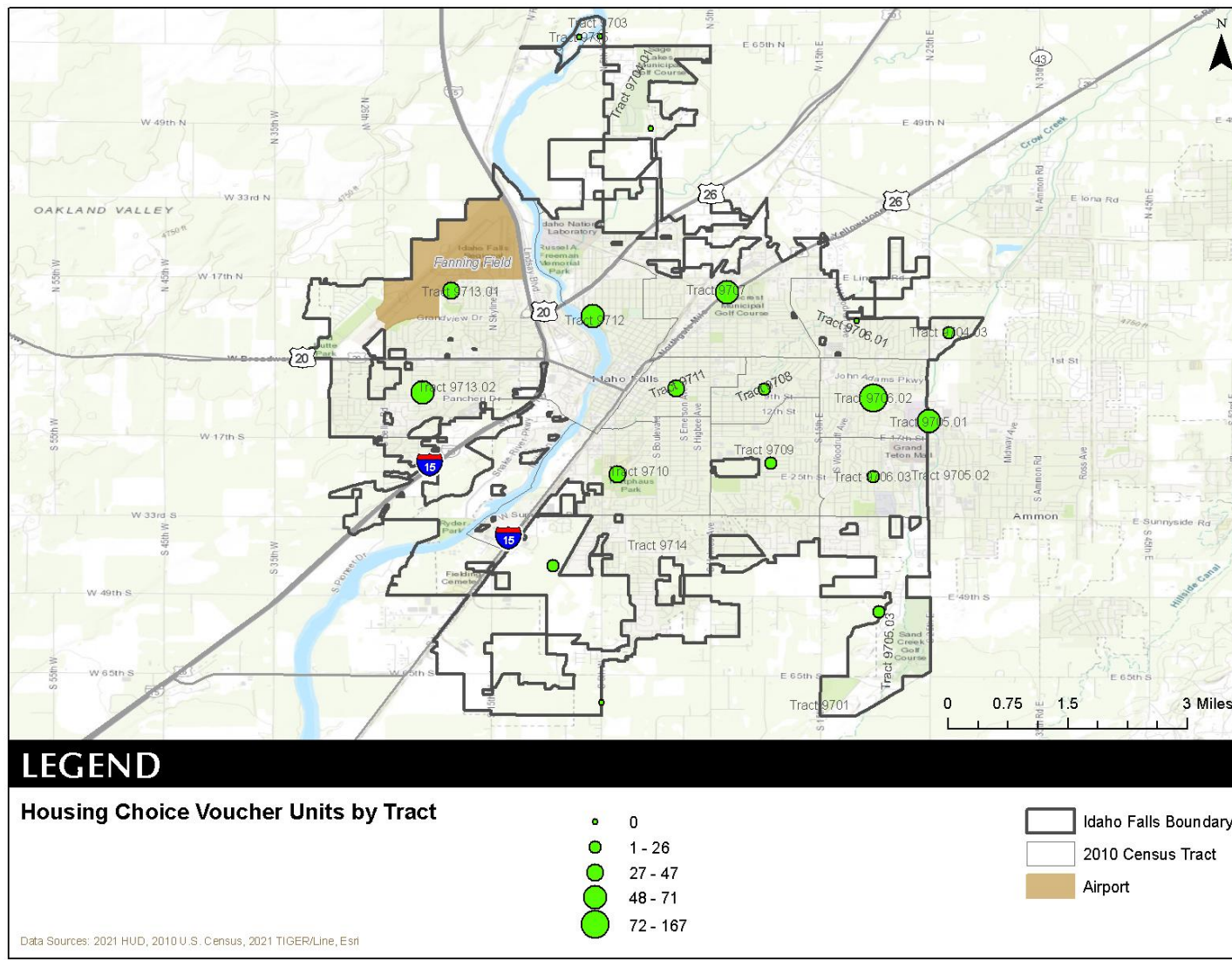
Table IV.44 **Residents with Disabilities by Subsidized Housing Type** Idaho Falls HUD AFFH Raw Database		
Program	**Total Units**	**Total Disabled Units**
Public Housing	0	0
Project Based Section 8	0	0
Other HUD Multifamily	0	0
Housing Choice Vouchers	631	207
Total	**631**	**207**

There are no public housing authorities in the City of Idaho Falls. There are units administered by the Idaho Housing & Finance Association (IHFA) in the City.

Disparities in Access to Opportunity

Map IV.9 shows housing choice vouchers. Low Income Housing Tax Credit (LIHTC) units are shown in Map IV.10 and Map IV.11 shows other assisted multi-family housing units in Idaho Falls. The location of these units do not appear to be concentrated in any areas within the City

Map IV.9
Housing Choice Voucher Units
Idaho Falls
2019 ACS, 2021 Tigerline, HUD AFFH Tool

LEGEND

Housing Choice Voucher Units by Tract

- 0
- 1 - 26
- 27 - 47
- 48 - 71
- 72 - 167

Idaho Falls Boundary
2010 Census Tract
Airport

Data Sources: 2021 HUD, 2010 U.S. Census, 2021 TIGER/Line, Esri

Map IV.10
Low Income Housing Tax Credit (LIHTC) Units
Idaho Falls
2019 ACS, 2021 Tigerline, HUD AFFH Tool

LEGEND

Low-Income Housing Tax Credit Units by Tract

- 38
- 39 - 47
- 48 - 65
- 66 - 79
- 80 - 155

Idaho Falls Boundary

2010 Census Tract

Airport

Data Sources: 2021 HUD, 2010 U.S. Census, 2021 TIGER/Line, Esri
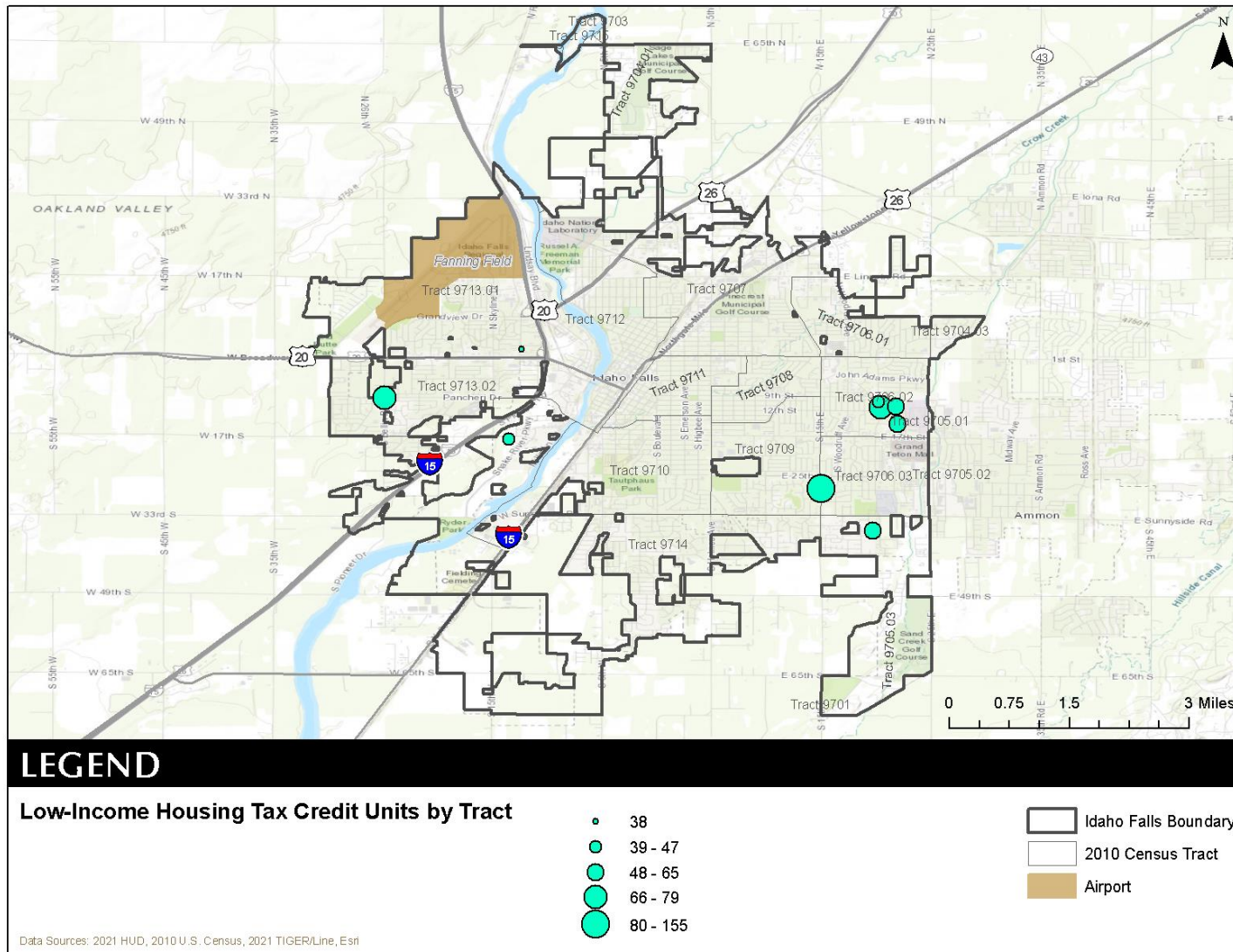
Map IV.11
Other HUD Multi-Family Units
Idaho Falls
2019 ACS, 2021 Tigerline, HUD AFFH Tool
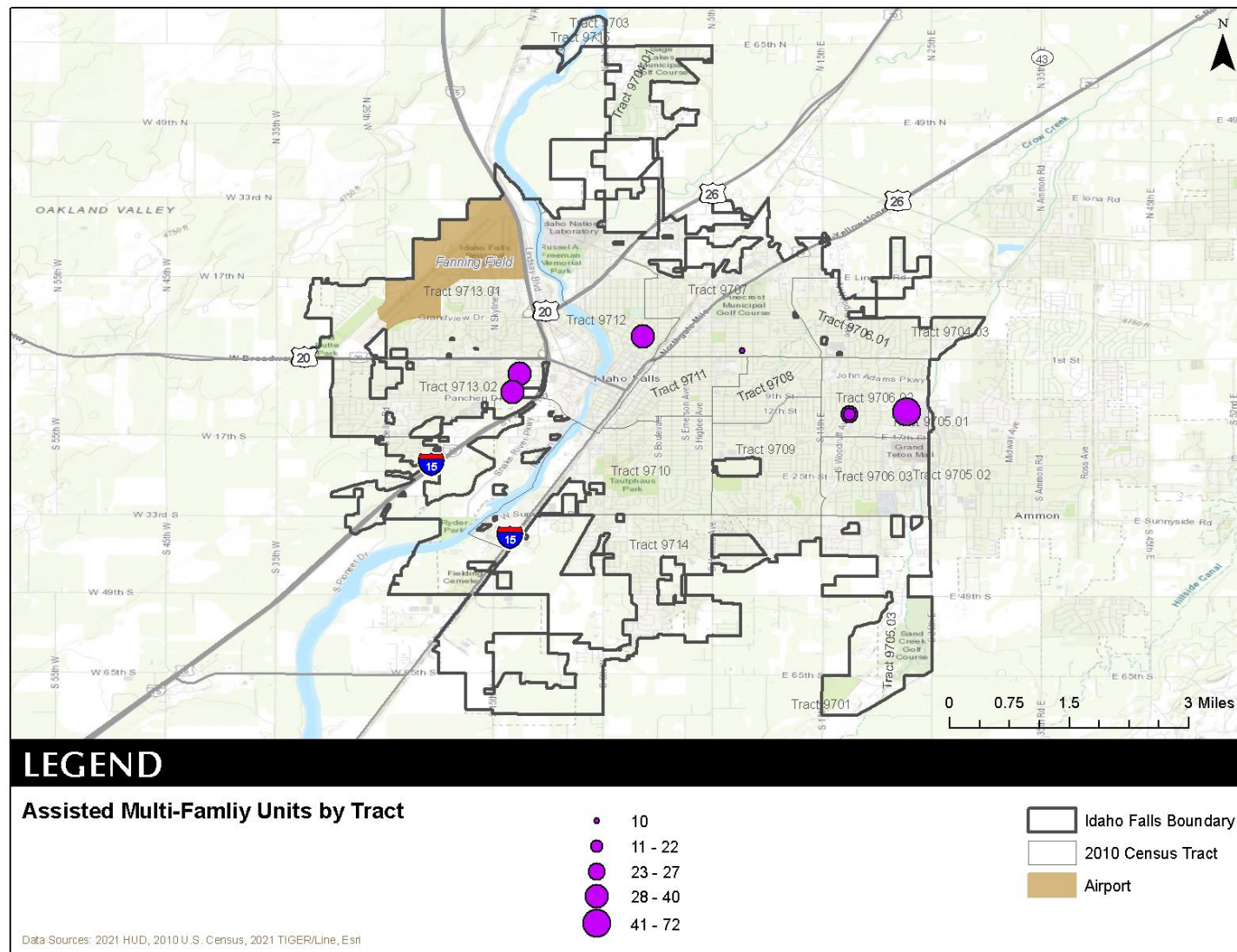
G. DISABILITY AND ACCESS ANALYSIS

Section 504 of the Rehabilitation Act of 1973 prohibits discrimination based on disability in any program or activity receiving federal assistance.[15] Title II of the Americans with Disabilities Act of 1990 prohibits discrimination based on disability by public entities. HUD enforces the housing-related activities of public entities, including public housing, housing assistance, and housing referrals.[16]

Persons with Disabilities

Disability by age, as estimated by the 2019 ACS, is shown in Table IV.45, below. The disability rate for females was 17.9 percent, compared to 15.1 percent for males. The disability rate grew precipitously higher with age, with 54.5 percent of those over 75 experiencing a disability.

	Male		Female		Total	
Table IV.45 **Disability by Age** Idaho Falls 2019 Five-Year ACS Data						
Age	**Disabled Population**	**Disability Rate**	**Disabled Population**	**Disability Rate**	**Disabled Population**	**Disability Rate**
Under 5	0	0.0%	76	3.7%	76	1.5%
5 to 17	529	8.4%	656	10.3%	1,185	9.4%
18 to 34	918	13.3%	811	11.5%	1,729	12.4%
35 to 64	1,749	17.0%	2,189	21.2%	3,938	19.1%
65 to 74	558	24.5%	505	21.2%	1,063	22.8%
75 or Older	812	52.9%	1,174	55.6%	1,986	54.5%
Total	**4,566**	**15.1%**	**5,411**	**17.9%**	**9,977**	**16.5%**

The number of disabilities by type, as estimated by the 2019 ACS, is shown in Table IV.46. Some 7.4 percent have an ambulatory disability, 7.7 have an independent living disability, and 3.6 percent have a self-care disability.

Table IV.46 **Total Disabilities Tallied: Aged 5 and Older** Idaho Falls 2019 Five-Year ACS		
Disability Type	**Population with Disability**	**Percent with Disability**
Hearing disability	2,781	4.6%
Vision disability	2,358	3.9%
Cognitive disability	4,914	8.8%
Ambulatory disability	4,137	7.4%
Self-Care disability	2,015	3.6%
Independent living difficulty	3,303	7.7%

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[15] 29 U.S.C. §§794
[16] 42 U.S.C. §§ 12131 – 12165
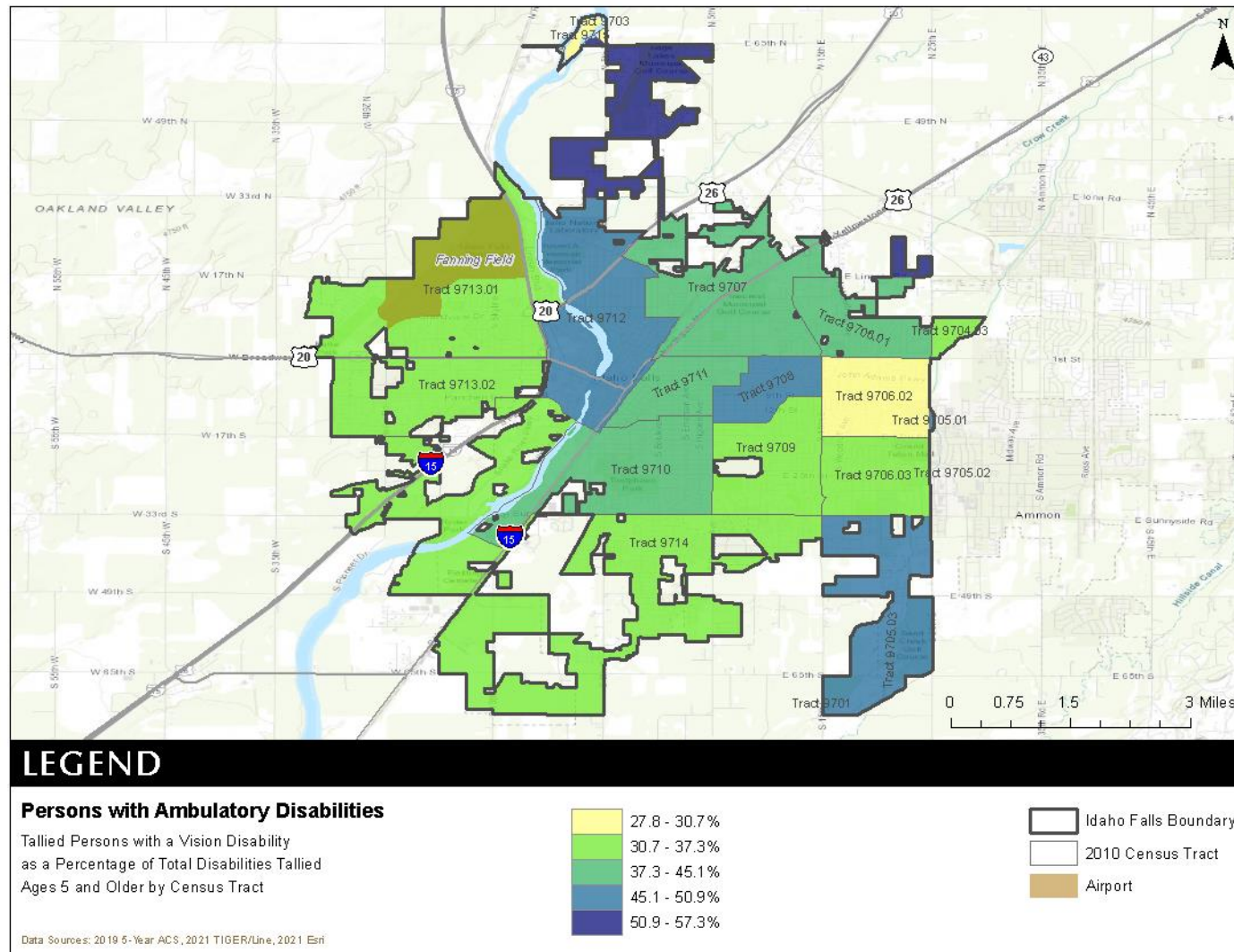
Housing Accessibility

Accessible housing units are located throughout the City. However, many newer housing units are located outside city center areas. These newer housing units are more likely to have the mandatory minimum accessibility features. Public input echoed this sentiment, with comments stating that older housing units are less likely to have accessibility features.

About 32.8 percent of publicly supported housing units, according to HUD's AFFH database, are accessible.

Table IV.47 Residents with Disabilities by Subsidized Housing Type Idaho Falls HUD AFFH Raw Database		
Program	**Total Units**	**Total Disabled Units**
Public Housing	0	0.0
Project Based Section 8	0	0
Other HUD Multifamily	0	0.0
Housing Choice Vouchers	631	207
Total	**631**	**207**

The maps on the following pages show the distribution of households with various disabilities. There does not appear to be a concentration of households by disability type in any one area of the City.

Map IV.12
Persons with Ambulatory Disabilities
Idaho Falls
2019 ACS, 2021 Tigerline, HUD AFFH Tool

LEGEND

Persons with Ambulatory Disabilities

Tallied Persons with a Vision Disability
as a Percentage of Total Disabilities Tallied
Ages 5 and Older by Census Tract

Data Sources: 2019 5-Year ACS, 2021 TIGER/Line, 2021 Esri

	27.8 - 30.7%
	30.7 - 37.3%
	37.3 - 45.1%
	45.1 - 50.9%
	50.9 - 57.3%

Idaho Falls Boundary

2010 Census Tract

Airport

Map IV.13
Persons with Cognitive Disabilities
Idaho Falls
2019 ACS, 2021 Tigerline, HUD AFFH Tool

LEGEND

Persons with Cognitive Disabilities

Tallied Persons with a Cognitive Disability
as a Percentage of Total Disabilities Tallied
Ages 5 and Older by Census Tract

Data Sources: 2019 5-Year ACS, 2021 TIGER/Line, 2021 Esri

▨	21.5 - 28.5%
▨	28.5 - 39.5%
▨	39.5 - 44.6%
▨	44.6 - 51.2%
▨	51.2 - 64.5%

- Idaho Falls Boundary
- 2010 Census Tract
- Airport
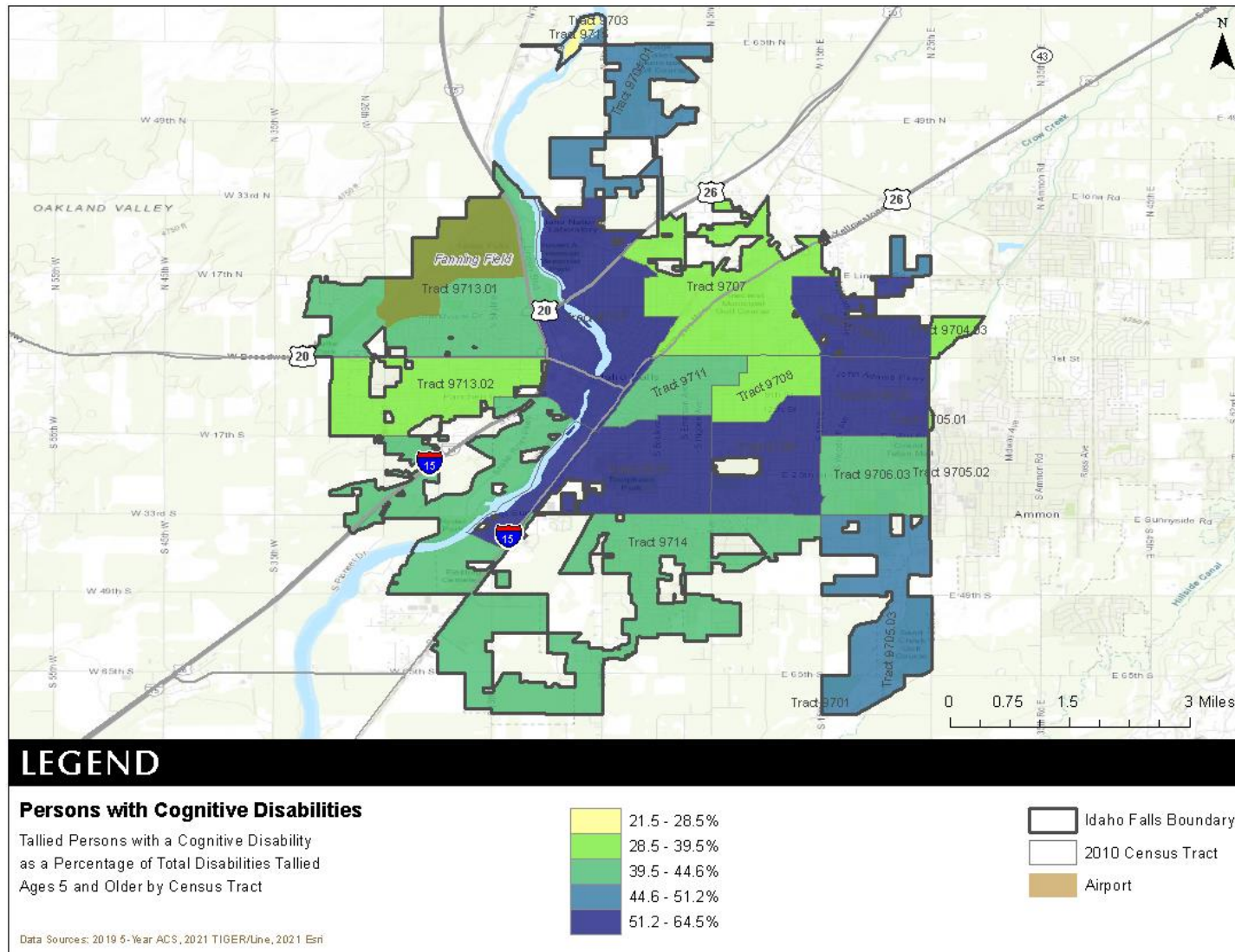
Map IV.14
Persons with Hearing Disabilities
Idaho Falls
2019 ACS, 2021 Tigerline, HUD AFFH Tool

LEGEND

Persons with Hearing Disabilities

Tallied Persons with a Hearing Disability
as a Percentage of Total Disabilities Tallied
Ages 5 and Older by Census Tract

Data Sources: 2019 5-Year ACS, 2021 TIGER/Line, 2021 Esri

20.9 - 23.8%
23.8 - 29.3%
29.3 - 33.1%
33.1 - 42.4%
42.4 - 54.2%

Idaho Falls Boundary
2010 Census Tract
Airport
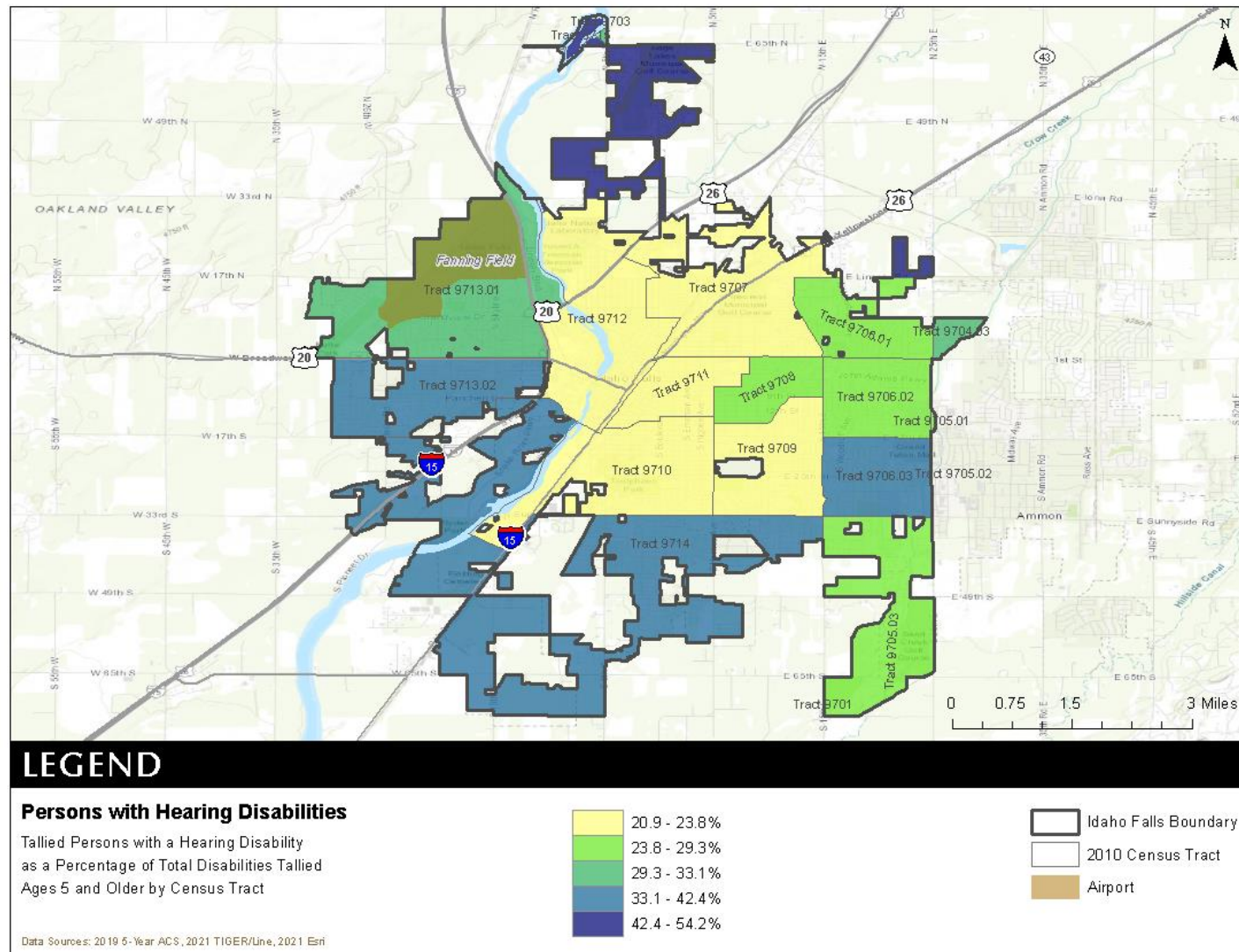
Map IV.15
Persons with Independent Living Disabilities
Idaho Falls
2019 ACS, 2021 Tigerline, HUD AFFH Tool

LEGEND

**Persons with Independent Living
Difficulty Disabilities**
Tallied Persons with an Independent Living Difficulty
Disability as a Percentage of Total Disabilities Tallied
Ages 5 and Older by Census Tract

Data Sources: 2019 5-Year ACS, 2021 TIGER/Line, 2021 Esri

- 18.9 - 19.4%
- 19.4 - 28.5%
- 28.5 - 33.3%
- 33.3 - 35.8%
- 35.8 - 46.7%

- Idaho Falls Boundary
- 2010 Census Tract
- Airport
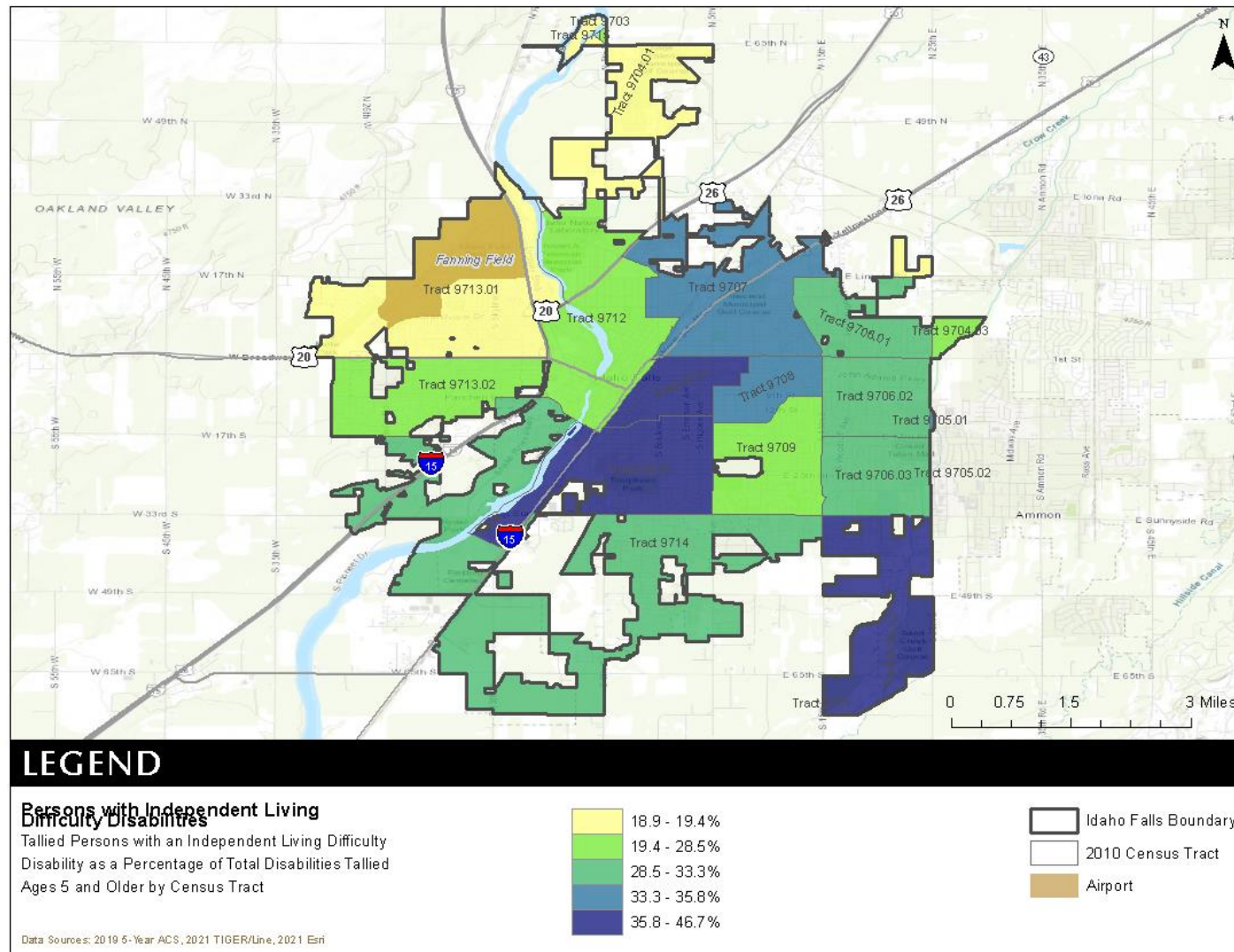
Map IV.16
Persons with Self Care Disabilities
Idaho Falls
2019 ACS, 2021 Tigerline, HUD AFFH Tool

LEGEND

Persons with Self-Care Disabilities

Tallied Persons with a Self-Care Disability
as a Percentage of Total Disabilities Tallied
Ages 5 and Older by Census Tract

Data Sources: 2019 5-Year ACS, 2021 TIGER/Line, 2021 Esri

10.6 - 12.3%	
12.3 - 16.6%	
16.6 - 19.0%	
19.0 - 24.6%	
24.6 - 34.8%	

Idaho Falls Boundary
2010 Census Tract
Airport
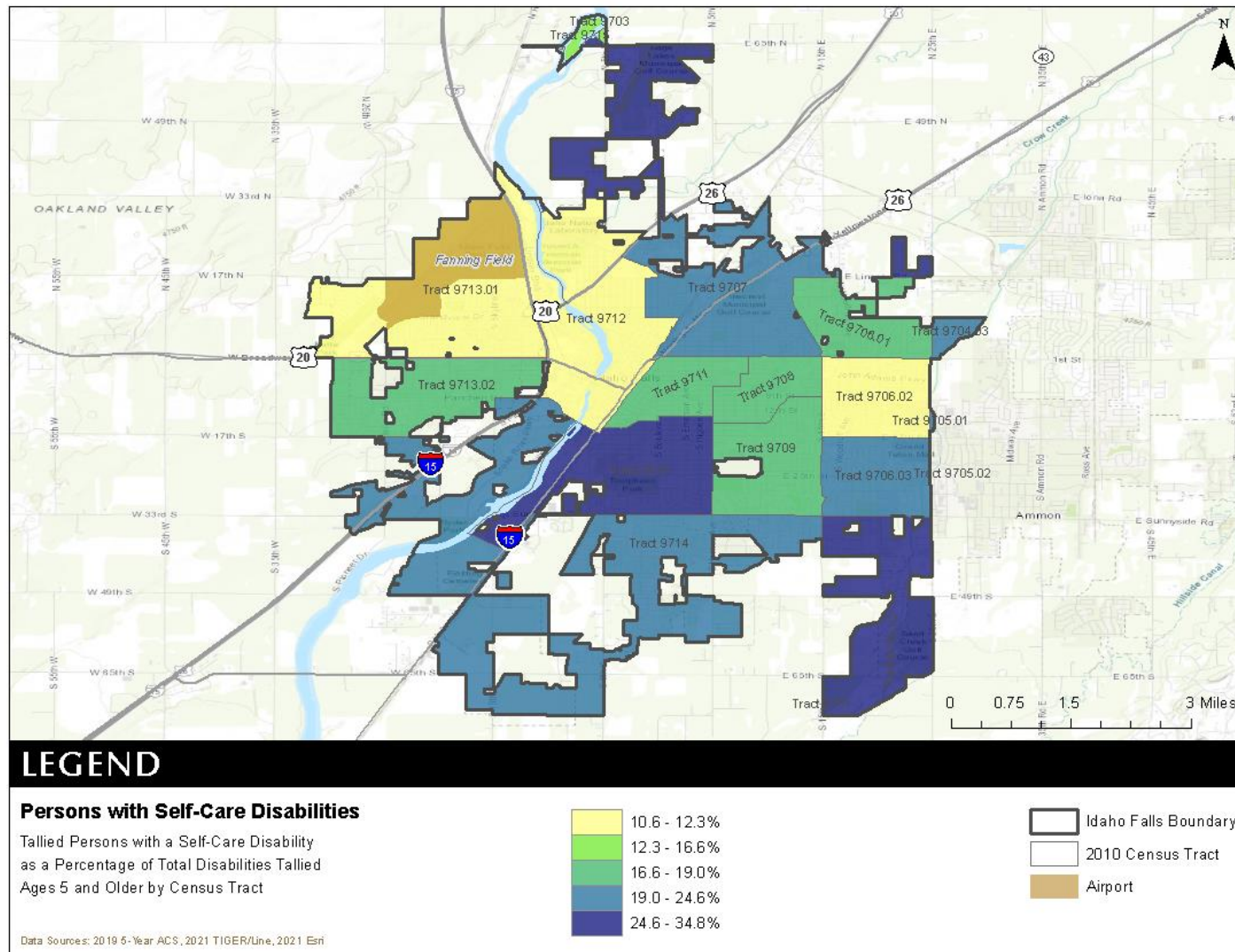
Map IV.17
Persons with Vision Disabilities
Idaho Falls
2019 ACS, 2021 Tigerline, HUD AFFH Tool

LEGEND

Persons with Vision Disabilities

Tallied Persons with a Vision Disability
as a Percentage of Total Disabilities Tallied
Ages 5 and Older by Census Tract

Data Sources: 2019 5-Year ACS, 2021 TIGER/Line, 2021 Esri

	3.7 - 10.6%
	10.6 - 21.3%
	21.3 - 28.5%
	28.5 - 33.3%
	33.3 - 53.5%

	Idaho Falls Boundary
	2010 Census Tract
	Airport
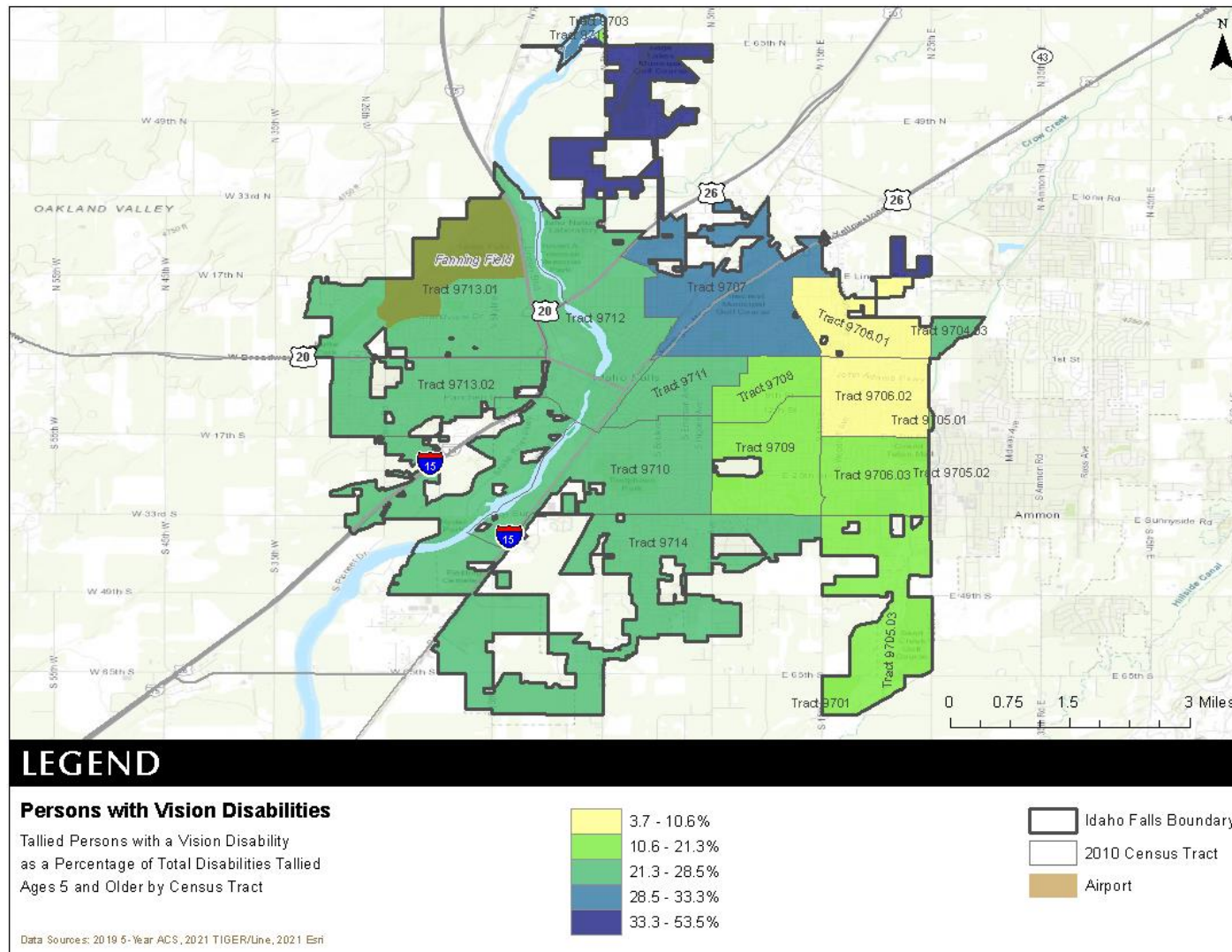
H. FAIR HOUSING ENFORCEMENT, OUTREACH CAPACITY, & RESOURCES

FEDERAL FAIR HOUSING LAWS

Federal laws provide the backbone for U.S. fair housing regulations. The following federal and state rules, regulations, and executive orders inform municipalities and developers of their fair housing obligations and the rights of protected classes. Many of these statutes were successful in generating specialized resources, such as data, to aid organizations, government entities, and individuals in affirmatively furthering fair housing. While some laws have been previously discussed in this report, a list of laws related to fair housing, as defined on the U.S. Department of Housing and Urban Development's (HUD's) website, is presented below:

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act)[17]

The Fair Housing Act prohibits discrimination in the sale, rental, financing, and insuring of housing on the basis of race, color, religion, sex, and national origin. In 1988, the act was amended to include family status and disability as protected classes, which includes children under the age of 18 living with parents or legal custodians, pregnant women, and persons securing custody of children under the age of 18. Jurisdictions may add protected classes but are not allowed to subtract from the seven federally protected classes.[18] The Act also contains design and construction accessibility provisions for certain new multi-family dwellings developed for first occupancy on or after March 13, 1991.[19] On April 30, 2013, HUD and the Department of Justice released a Joint Statement that provides guidance regarding the persons, entities, and types of housing and related facilities that are subject to the accessible design and construction requirements of the Act.

It is unlawful under the Act to discriminate against a person in a protected class by: Refusing to sell or rent after the making of a bona fide offer, or to refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny, a dwelling to any person because of race, color, religion, sex, familial status, or national origin; discriminating against any person in the terms, conditions, or privileges of sale or rental of a dwelling, or in the provision of services or facilities based on a protected class; representing that a dwelling is not available for inspection, sale, or rental when it is, in fact, available; publishing an advertisement indicating any preference, limitation, or discrimination against a protected class; or refusing to allow a person with a disability to make a reasonable modification to the unit at the renter's own expense.

There are several exceptions to the law. It is legal for developments or buildings for the elderly to exclude families with children. In addition, single-family homes being sold by the owner of an owner-occupied 2 family home may be exempt, unless a real estate agency is involved, if they have advertised in a discriminatory way, or if they have made discriminatory statements. There are no exemptions for race discrimination because race is covered by other civil rights laws.

The following are examples of Fair Housing Act violations:

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[17] 42 U.S.C. 3601, et. Seq., as amended in 1988
[18] "HUD Fair Housing Laws and Presidential Executive Orders."
http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/FHLaws
[19] "Title VIII: Fair Housing and Equal Opportunity."
http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/progdesc/title8

1. Making any representation, directly or implicitly, that the presence of anyone in a protected class in a neighborhood or apartment complex may or will have the effect of lowering property taxes, reduce safety, make the neighborhood and/or schools worse, change the character of the neighborhood, or change the ability to sell a home.
2. Providing inconsistent, lesser, or unequal service to customers or clients who are members of a protected class, such as failing to return calls from a buyer agent to avoid presenting a contract to your seller, avoiding or delaying an appointment for a showing a listing, making keys unavailable, failing to keep appointments, or refusing maintenance or repairs to an apartment.
3. Requiring higher standards for a member of a protected class, including asking for more references or demanding a higher credit rating.
4. Requiring employers to make distinctions on applications, or in the application process, among protected class members, including marking applications to indicate race, sex, etc. of applicant or misrepresenting availability for particular protected classes.
5. Advertising in a manner that indicates a preference for a particular class and thereby excluding protected class members.

Title VI of the Civil Rights Act of 1964

Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance, including denying assistance, offering unequal aid, benefits, or services, aiding or perpetuating discrimination by funding agencies that discriminate, denying planning or advisory board participation, using discriminatory selection or screening criteria, or perpetuating the discrimination of another recipient based on race, color, or national origin.

Section 504 of the Rehabilitation Act of 1973

The Act prohibits discrimination based on disability in any program or activity receiving federal financial assistance. The concept of "reasonable accommodations" and "reasonable modifications" was clarified in memos dated May 17, 2004 and March 5, 2008. Reasonable accommodations are changes in rules, policies, practices, or services so that a person with a disability can participate as fully in housing activities as someone without a disability. Reasonable modifications are structural changes made to existing premises, occupied or to be occupied by a person with a disability so they can fully enjoy the premises.

Section 109 of the Housing and Community Development Act of 1974

Section 109 prohibits discrimination on the basis of race, color, national origin, sex or religion in programs or activities funded from HUD's Community Development Block Grant Program.

Title II of the Americans with Disabilities Act of 1990

Title II applies to state and local government entities and protects people with disabilities from discrimination on the basis of disability in services, programs, and activities. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals.

Architectural Barriers Act of 1968

The Act requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 be accessible to and useable by handicapped persons. The ABA specifies accessibility standards for ramps, parking, doors, elevators, restrooms, assistive listening

systems, fire alarms, signs, and other accessible building elements and are enforced through the Department of Defense, HUD, the General Services Administration, and the U.S. Postal Services.

Age Discrimination Act of 1975

The Age Discrimination Act prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance, applies to all ages, and may be enforced by the head of any Federal department or agency by terminating grant funding for those with an express finding on the record who fail to comply with the Act after reasonable notice. HUD established regulations for implementation of the Age Discrimination Act for HUD programs.

Title IX of the Education Amendments Act of 1972

Title IX prohibits discrimination on the basis of sex or blindness in education programs or activities that receive federal financial assistance.[20]

The Home Mortgage Disclosure Act (HMDA)

HMDA requires both depository and non-depository lenders to collect and publicly disclose information about housing-related applications and loans, including the race, ethnicity, sex, loan amount, and income of mortgage applicants and borrowers by Census tract. Depository institutions that meet the following criteria are required to report:

- Bank, credit union, or savings association
- Total assets must exceed the coverage threshold[21]
- The institution must have had a home or branch office in a Metropolitan Statistical Area (MSA)
- The institution must have originated or refinanced at least one home purchase loan secured by a first lien on a one- to four-family dwelling
- The institution must be federally insured or regulated
- The mortgage loan must have been insured, guaranteed, or supplemented by a federal agency or intended for sale to Fannie Mae or Freddie Mac

For other institutions, including non-depository institutions, the reporting criteria are:

1. The institution must be a for-profit organization
2. The institution's home purchase loan originations must equal or exceed 10 percent of the institution's total loan originations, or more than $25 million
3. The institution must have had a home or branch office in an MSA or have received applications for, originated, or purchased five or more home purchase loans, home improvement loans, or refinancing on property located in an MSA in the preceding calendar year
4. The institution must have assets exceeding $10 million or have originated 100 or more home purchases in the preceding calendar year

In addition to reporting race and ethnicity data for loan applicants, the HMDA reporting requirements were modified in response to the Predatory Lending Consumer Protection Act of 2002 as well as the

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[20] "HUD Fair Housing Laws and Presidential Executive Orders."
[21] Each December, the Federal Reserve announces the threshold for the following year. The asset threshold may change from year to year based on changes in the Consumer price Index for Urban Wage Earners and Clerical Workers.

Home Owner Equity Protection Act (HOEPA). Consequently, loan originations are now flagged in the data system for three additional attributes:

1. If they are HOEPA loans
2. Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans)
3. Presence of high-annual percentage rate loans (HALs), defined as more than three percentage points for purchases when contrasted with comparable treasury instruments or five percentage points for refinance loans

EXECUTIVE ORDERS

Executive Order 11063 Equal Opportunity in Housing

Signed by President Kennedy on November 20, 1962, the Order prohibits discrimination based on race, color, religion, creed, sex, or national origin in the sale, leasing, rental, or other disposition of properties and facilities owned, operated, or funded by the federal government. The Order also prohibits discrimination in lending practices that involve loans insured or guaranteed by federal government.

Executive Order 12892 Leadership and Coordination of Fair Housing in Federal Programs: Affirmatively Furthering Fair Housing

Signed by President Clinton on January 11, 1994, the Order required federal agencies to affirmatively further fair housing in the programs and activities with the Secretary of HUD coordinating the effort, and established the President's Fair Housing Council, which is chaired by the Secretary of HUD.

Executive Order 12898 Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations

Signed by President Clinton on February 11, 1994, the order requires federal agencies to practice environmental justice in its programs, policies, and activities. Specifically, developers and municipalities using federal funds must evaluate whether or not a project is located in a neighborhood with a concentration of minority and low-income residents or a neighborhood with disproportionate adverse environmental effects on minority and low-income populations. If those conditions are met, viable mitigation measures or alternative project sites must be considered.

Executive Order 13166 Improving Access to Services for Persons with Limited English Proficiency

Signed by President Clinton on August 11, 2000, the Order eliminates limited English proficiency as a barrier to full and meaningful participation in federal programs by requiring federal agencies to examine the services they provide, identify the need for LEP services, then develop and implement a system to provide those services. The Department of Justice issued policy guidance which set forth compliance standards to ensure accessibility to LEP persons.

Executive Order 13217 Community Based Alternatives for Individuals with Disabilities

Signed by President Bush on June 18, 2001, the Order requires federal agencies to evaluate their policies and programs to determine if they need to be revised to improve the availability of community-based living arrangements for persons with disability, noting that isolating or segregating people with disabilities in institutions is a form of disability-based discrimination prohibited by Title II of the ADA.

STATE AND LOCAL FAIR HOUSING LAWS AND RESOURCES

Idaho Fair Housing Law (Title 67-State Government and State Affairs) prohibits discrimination in real estate transactions which is based on: Race, Color, National Origin, Religion, Disability, and Sex. Idaho law applies to all real estate transactions, including: Advertising , Showing, Renting, Leasing, Buying, Selling, and Financing.[22] Idaho law requires that an administrative complaint be filed with the Idaho Human Rights Commission (IHRC) before a discrimination lawsuit can be filed. An administrative complaint may be drafted by an individual, by a lawyer or by a commission staff member based on information provided by an individual.

City of Idaho Falls

The City of Idaho Falls adds the prohibition on the basis of sexual orientation and/or gender expression/identity from discrimination in housing. Chapter 11 of the City's Code states:

> The City has determined that discrimination on the basis of sexual orientation and/or gender identity/expression shall be prohibited, as set out in this Chapter, in order to help ensure that all persons, regardless of sexual orientation or gender expression/identity, are afforded equal opportunities in employment, housing, and public resort, accommodation, assemblage, and amusement.[23]

Idaho Human Rights Commission

The Idaho Human Rights Commission (IHRC) is an independent agency established by the Idaho legislature to help protect persons within the state from illegal discrimination.[24] The Commission's Protection process includes Mediation, No Cause Findings, Probable Cause Findings, and Litigation.

Contact Information:
317 W. Main St.
Second Floor
Boise, ID 83735-0660
inquiry@ihrc.idaho.gov
971-673-0761 (208) 334-2873
Toll Free: (888) 249-7025

Intermountain Fair Housing Council

The Intermountain Fair Housing Council (IFHC) is a nonprofit organization whose mission is to ensure open and inclusive housing for all persons without regard to race, color, sex, religion, national origin, familial status, sexual orientation, gender identity, a source of income, or disability. The IFHC attempts to eradicate discrimination through, education on fair housing laws, housing information and referral, housing counseling, and assistance with mediating and or filing fair housing complaints, among other

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[22] https://humanrights.idaho.gov/Idaho-Law/Contexts/Housing
[23] https://www.idahofallsidaho.gov/DocumentCenter/View/169/Chapter-11---Non-discriminationPDF?bidId=
[24] https://humanrights.idaho.gov/What-We-Do/Protection

things. The IFHC also provides education and outreach on fair housing laws and practices to housing providers and others.[25]

Contact Information:
4696 W. Overland Rd., Suite 140
Boise, Idaho 83705
208-383-0695
1-800-717-0695
contact@ifhcidaho.org

FAIR HOUSING COMPLAINTS

Federal Fair Housing Law prohibits housing discrimination based on race, color, national origin, religion, sex, familial status, or disability. An individual may file a complaint if they feel their rights have been violated. HUD maintains records of complaints that represent potential and actual violations of federal housing law.

Fair Housing and Equal Opportunity (FHEO) begins its complaint investigation process shortly after receiving a complaint. A complaint must be filed within one year of the last date of the alleged discrimination under the Fair Housing Act. Other civil rights authorities allow for complaints to be filed after one year for good cause, but FHEO recommends filing as soon as possible. Generally, FHEO will either investigate the complaint or refer the complaint to another agency to investigate. Throughout the investigation, FHEO will make efforts to help the parties reach an agreement. If the complaint cannot be resolved voluntarily by an agreement, FHEO may issue findings from the investigation. If the investigation shows that the law has been violated, HUD or the Department of Justice may take legal action to enforce the law.

At the date of this report, fair housing complaints have not yet been received. WES received acknowledgement of the Freedom of Information Act (FOIA) request from the HUD Seattle Regional Office., and expects to receive complaint data in the near future. Upon receipt, these data will be included in the report.

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[25] https://ifhcidaho.org/

I. FAIR HOUSING SURVEY RESULTS

The Fair Housing survey has a total of 121 responses. The majority of survey respondents are renters, accounting for 73 respondents, or in the appraisal industry, accounting for 26 respondents.

Table IV.47 What is your primary role in the housing industry Idaho Falls Fair Housing Survey	
Role	**Total**
Homeowner	0
Renter	73
Appraisal	26
Construction/Development	1
Insurance	2
Law/Legal Services	0
Lending/Mortgage Industry	1
Local Government	0
Property Management	1
Real Estate Sales/Brokerage	0
Service Provider	1
Other	8
Missing	0
Total	**121**

When asked how familiar they are with fair housing laws, about half of respondents indicated they were somewhat familiar.

Table IV.48 How familiar are you with Fair Housing Laws Idaho Falls Fair Housing Survey	
Response	**Total**
Not Familiar	26
Somewhat Familiar	62
Very Familiar	0
Missing	16
Total	**121**

A quarter respondents believed that fair housing laws are difficult to understand. About 30 percent of respondents were aware of where to guide someone to file a complaint if they felt their fair housing rights had been violated. Some 25 respondents were aware of fair housing education and training activities in Idaho Falls. Only 12 respondents have participated in fair housing training. These respondents indicated they have received trainings through an online program or webinar or in a seminar.

Respondents were most likely to be aware of impediments to fair housing choice in the private sector in the rental housing market and "other" housing services, followed by the real estate industry. However, the majority of respondents were not aware of impediments in any of these areas.

Table IV.49
Federal, State, and Local Fair Housing Laws
Idaho Falls
2021 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Do you think fair housing laws are difficult to understand or follow?	31	38	36	16	121
Do you know where to guide someone to file a complaint if they felt their fair housing rights had been violated?	36	69	0	16	121
Outreach and education activities, such as training and seminars, are used to help people better understand their rights and obligations under fair housing law. Are you aware of the educational activities or training opportunities available to you to learn about fair housing laws?	25	78	0	18	121
If you answered "yes" to the previous question, have you participated in fair housing activities or training?	12	40	0	69	121

Table IV.50
If you have received fair housing training, where did you receive training or how did you receive training?
Idaho Falls
2021 Fair Housing Survey

Response	Total
Through legal consultant	1
Online program or webinar	10
Seminar	7
Discussion topic at meeting	2
Local Jurisdiction	1

Table IV.51
Barriers to Fair Housing in the Private Sector
Idaho Falls
2021 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any impediments to fair housing choice in Idaho Falls in the following areas?					
The rental housing market (Example: Refusing to rent based on religion or color.)	13	54	25	29	121
Any other housing services	10	39	27	45	121
The real estate industry (Example: Only showing properties in certain areas to families with children.)	8	56	28	29	121
The home insurance industry (Example: Limiting policies and coverage for racial minorities.)	8	49	35	29	121
Housing construction and design fields (Example: New rental complexes built with narrow doorways that do not allow wheelchair accessibility.)	7	48	36	30	121
The mortgage and home lending industry (Example: Offering higher interest rates only to women or racial minorities.)	5	52	35	29	121
The home appraisal industry (Example: Basing home values on the ethnic composition of neighborhoods.)	5	49	38	29	121

Respondents were most likely to be aware of barriers in the public sector in barriers that limit access to government services. However, most respondents were unaware of impediments.

Table IV.52 Barriers to Fair Housing in the Public Sector Idaho Falls 2021 Fair Housing Survey Data					
Question	Yes	No	Don't Know	Missing	Total
Are you aware of any impediments to fair housing choice in Idaho Falls in the following areas?					
Barriers that limit access to government services, such as a lack of transportation, employment, or social services	14	37	25	45	121
The public rental housing market (Example: Refusing to rent based on religion or color.)	9	47	20	45	121
Land use policies (Example: Policies that concentrate multi-family housing in limited areas.)	8	42	25	46	121
Neighborhood or community development policies (Example: Policies that encourage development in narrowly defined areas of the community.)	8	42	26	45	121
Zoning laws (Example: Laws that restrict placement of group homes.)	6	44	25	46	121
Property assessment and tax policies (Example: Lack of tax incentives for making reasonable accommodations or modifications for persons with disabilities.)	6	42	28	45	121
Any local government actions or regulations in your community that act as barriers to fair housing choice	6	40	30	45	121
Occupancy standards or health and safety codes (Example: Codes being inadequately enforced in immigrant communities compared to other areas.)	5	44	26	46	121
Housing construction standards (Example: Lack of or confusing guidelines for construction of accessible housing.)	5	43	27	46	121
The real estate industry (Example: Only showing properties in certain areas to families with children.)	4	49	23	45	121
Publicly constructed housing (Example: New rental complexes built with narrow doorways that do not allow wheelchair accessibility.)	3	45	27	46	121
The home insurance industry (Example: Limiting policies and coverage for racial minorities.)	3	47	25	46	121
The permitting process (Example: Not offering written documents on procedures in alternate languages.)	3	43	28	47	121
The mortgage and home lending industry (Example: Offering higher interest rates only to women or racial minorities.)	2	48	25	46	121
The home appraisal industry (Example: Basing home values on the ethnic composition of neighborhoods.)	2	47	27	45	121

When asked if various factors are happening in Idaho Falls, respondents were most likely to find that lack of access seniors and/or people with disabilities to public transportation has a significant impact. This is followed by lack of access to affordable public housing, and lack of affordable public housing.

Table IV.53
Fair Housing in the Public Sector
Idaho Falls
2021 Fair Housing Survey

Question	Not at all	Slightly	Moderately	Significantly	Don't Know	Missing	Total
Are you and/or your community affected by lack of access to any of these factors listed below?							
Access for seniors and/or people with disabilities to public transportation	14	8	5	34	12	48	121
Access to affordable housing	7	10	16	33	10	45	121
Access to affordable public housing	15	7	13	24	17	45	121
Access to public transportation to schools, work, health care, services	19	14	16	22	5	45	121
Access to mental health care	29	13	7	18	8	46	121
Access for acceptance of housing choice vouchers	13	7	7	15	33	46	121
Access to health care	30	17	8	12	8	46	121
Access to proficient public schools	30	16	5	10	14	46	121
Access to school choice	31	9	13	8	13	47	121
Access to education about fair housing laws	18	9	9	6	34	45	121
Access to good nutrition, healthy food, fresh vegetables, etc.	38	9	17	5	6	46	121
Access to parks, libraries, other public facilities	41	15	9	5	6	45	121

There were similar findings when respondents were asked about issues that impact the community. The top-rated issues to have a significant impact were lack of affordable single-family housing, lack of affordable rental housing, and differences in access to housing opportunities for people of various income, races, ethnicity, genders, family status.

Table IV.54
Fair Housing in the Public Sector
Idaho Falls
2021 Fair Housing Survey

Question	Not at all	Slightly	Moderately	Significantly	Don't Know	Missing	Total
Do you think these issues are happening in Idaho Falls? If so, how much are the issues impacting your community?							
Lack of affordable single-family houses	6	6	19	37	7	46	121
Lack of affordable rental housing	6	11	16	35	8	45	121
Differences in access to housing opportunities for people of various income, races, ethnicity, genders, family status	19	14	11	18	14	45	121
Greater share of housing problems for those at lower incomes, of a specific race or ethnicity or national origin, disability, gender, or family status.	16	11	17	18	13	46	121
Concentrations of poverty	14	17	20	17	8	45	121
Lack of acceptance of housing choice vouchers	13	6	1	15	41	45	121
Challenges for persons with disabilities	13	16	16	14	17	45	121
No or limited education about fair housing laws	13	10	10	7	35	46	121
Segregation	34	13	9	5	12	48	121
Concentrations of racial or ethnic minorities	24	14	14	5	18	46	121
Gentrification and displacement due to economic pressures	20	14	12	5	25	45	121
Lack of housing discrimination enforcement	19	10	9	4	33	46	121

J. MUNICIPAL AND ZONING CODE REVIEW

A review of Idaho Falls Code was conducted in order to review if there are any barriers in the City's regulations that may impede access to housing. The following narrative is a description of any language or statutes that may act a barrier to fair housing choice.

This review gauged zoning and code regulations that may encourage or limit fair housing choice within the study area. The MCC was review for definitions of dwelling unit, disability, and family. The use of the word family, including a strict definition of family, or limiting the number of people in "family," may limit housing choices within a jurisdiction. The review included the allowance of mixed-use and conditional uses, which may increase opportunities for the development of more affordable housing choices. The review also asked about any policies that encourage the development of affordable housing, as well as any policies that promote fair housing within their communities. The review also sought to ascertain any restrictions to group housing and housing for seniors, including definitions and where these units may be permitted.

The following definitions were identified in Idaho Falls Code.

> *Dwelling Unit: A structure(s) designed for or occupied exclusively by one (1) "household," for living or sleeping purposes and having one (1) kitchen or set of cooking facilities, or group residence in which eight (8) or fewer unrelated persons with disabilities, elderly persons, or minors when in a facility licensed by the State of Idaho and who are supervised at the group residence in connection with their disability or age related infirmity under the following conditions:*
> > *1. Resident staff, if employed, need not be related to each other or to any of the persons with disabilities, elderly persons, or minors residing in the group residence*
> > *2. No more than two (2) of such staff shall reside in the dwelling at any one time.*
> *The term dwelling does not include boarding /rooming house, lodging, residential care facility or recreational vehicle.*
>
> *Household: One (1) or more individuals occupying a dwelling unit and living as a single household unit, and pursuant to IC §67-6531 any group residence in which eight (8) or fewer unrelated persons with disabilities or elderly persons reside and who are supervised at the group residence in connection with their disability or age related infirmity.*

Summary

The review of the City's code did not reveal any obvious obstructions to the development of affordable housing. However, the City may review its current policies to identify ways to encourage the development of affordable housing though incentives and inclusionary policies, acknowledging that the City's comprehensive Plan is currently under redevelopment.

Section V. Fair Housing Goals and Priorities

Overview

Title VIII of the 1968 Civil Rights Act, also known as the Federal Fair Housing Act, made it illegal to discriminate in the buying, selling, or renting of housing based on a person's race, color, religion, or national origin. Sex was added as a protected class in the 1970s. In 1988, the Fair Housing Amendments Act added familial status and disability to the list, making a total of seven federally protected characteristics. Federal fair housing statutes are largely covered by the following:

1. The Fair Housing Act,
2. The Housing Amendments Act, and
3. The Americans with Disabilities Act.

The purpose of fair housing law is to protect a person's right to own, sell, purchase, or rent housing of his or her choice without fear of unlawful discrimination. The goal of fair housing law is to allow everyone equal opportunity to access housing.

Assessing Fair Housing

Provisions to affirmatively further fair housing are long-standing components of the U.S. Department of Housing and Urban Development's (HUD's) housing and community development programs. These provisions come from Section 808(e) (5) of the federal Fair Housing Act, which requires that the Secretary of HUD administer federal housing and urban development programs in a manner that affirmatively furthers fair housing.

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single planning process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG)[26], and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle. As a part of the consolidated planning process, and entitlement communities that receive such funds from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing (AFFH). This was described in the Analysis of Impediments to Fair Housing Choice and a Fair Housing Planning Guide offering methods to conduct such a study was released in March of 1993.

In 2015, HUD released a new AFFH rule, which gave a format, a review process, and content requirements for the newly named "Assessment of Fair Housing", or AFH. The assessment would now include an evaluation of equity, the distribution of community assets, and access to opportunity within the community, particularly as it relates to concentrations of poverty among minority racial and ethnic populations. Areas of opportunity are physical places, areas within communities that provide things one needs to thrive, including quality employment, high performing schools, affordable housing, efficient public transportation, safe streets, essential services, adequate parks, and full-service grocery stores. Areas lacking opportunity, then, have the opposite of these attributes.

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[26] The Emergency Shelter Grants program was renamed the Emergency Solutions Grants program in 2011.

The AFH would also include measures of segregation and integration and provide some historical context about how such concentrations became part of the community's legacy. Together, these considerations were then intended to better inform public investment decisions that would lead to amelioration or elimination of such segregation, enhancing access to opportunity, promoting equity, and hence housing choice. Equitable development requires thinking about equity impacts at the front end, prior to the investment occurring. That thinking involves analysis of economic, demographic, and market data to evaluate current issues for citizens who may have previously been marginalized from the community planning process. All this would be completed by using an on-line Assessment Tool.

However, on January 5, 2018, HUD issued a notice that extended the deadline for submission of an AFH by local government consolidated plan program participants to their next AFH submission date that falls after October 31, 2020. Then, on May 18, 2018, HUD released three notices regarding the AFFH; one eliminated the January 5, 2018, guidance; a second withdrew the on-line Assessment Tool for local government program participants; and the third noted that the AFFH certification remains in place. HUD went on to say that the AFFH databases and the AFFH Assessment Tool guide would remain available for the AI; and, encouraged jurisdictions to use them, if so desired.

Hence, the AI process involves a thorough examination of a variety of sources related to housing, the fair housing delivery system, housing transactions, locations of public housing authorities, areas having racial and ethnic concentrations of poverty and access to opportunity. The development of an AI also includes public input, and interviews with stakeholders, public meetings to collect input from citizens and interested parties, distribution of draft reports for citizen review, and formal presentations of findings and impediments, along with actions to overcome the identified fair housing issues/impediments.

In accordance with the applicable statutes and regulations governing the Consolidated Plan, the City of Idaho Falls certifies that they will affirmatively further fair housing, by taking appropriate actions to overcome the effects of any impediments identified in the Analysis of Impediments to Fair Housing Choice and maintaining records that reflect the analysis and actions taken in this regard.

Overview of Findings

As a result of detailed demographic, economic, and housing analysis, along with a range of activities designed to foster public involvement and feedback, Idaho Falls has identified a series of fair housing issues/impediments, and other contributing factors that contribute to the creation or persistence of those issues.

Table V.1, on the following page, provides a list of the contributing factors that have been identified as causing these fair housing issues/impediments and prioritizes them according to the following criteria:
1. High: Factors that have a direct and substantial impact on fair housing choice
2. Medium: Factors that have a less direct impact on fair housing choice, or that Idaho Falls has limited authority to mandate change.
3. Low: Factors that have a slight or largely indirect impact on fair housing choice, or that Idaho Falls has limited capacity to address.

Table V.1 Contributing Factors City of Idaho Falls		
Contributing Factors	**Priority**	**Justification**
Moderate to high levels of segregation	Low	Black and Native Hawaiian households had high levels of segregation. However, these racial groups represent a small percentage of the population, at less than one percent each of the overall population.
Access to labor market engagement	Low	Native American and Hispanic households have less access to labor market engagement as indicated by the Access to Opportunity index. However, the City has little control over impacting labor market engagement on a large scale.
Insufficient affordable housing in a range of unit sizes	High	Some 27.9 percent of households have cost burdens. This is more significant for renter households, of which 45.7 percent have cost burdens. This signifies a lack of housing options that are affordable to a large proportion of the population.
Racial and ethnic minority households with disproportionate rates of housing problems	High	The overall rate of housing problems in the City of Idaho Falls is 28.1 percent, according to CHAS data. Asian, American Indian, Pacific Islander, and Hispanic households experience housing problems at a disproportionate rate overall.
Discriminatory patterns in Lending	Med	Black and American Indian/ Native American applicant were denied at a rate of 16.2 and 14.3 percent, respectively, compared to 8.1 percent of white applicants. Hispanic applicants were denied at an average rate of 14.8 percent, compared to the 7.5 percent for non-Hispanic applicants.
Insufficient accessible affordable housing	High	The number of accessible affordable units may not meet the need of the growing elderly and disabled population, particularly as the population continues to age. Some 54.5 percent of persons aged 75 and older have at least one form of disability.
NIMBYism	High	Public input suggested one of the major barriers to the development of affordable housing options in the City was the Not In My Back Yard (NIMBY) mentality in the City.
Insufficient fair housing education	High	The fair housing survey and public input indicated a lack of knowledge about fair housing and a need for education.
Insufficient understanding of credit	High	The fair housing survey and public input indicated an insufficient understanding of credit needed to access mortgages.

FAIR HOUSING ISSUES, CONTRIBUTING FACTORS, AND PROPOSED ACHIEVEMENTS

Table V.2 summarizes the fair housing issues/impediments and contributing factors, including metrics, milestones, and a timeframe for achievements.

Table V.2			
Fair Housing Goal	**Fair Housing Issue(s)**	**Impediments to Fair Housing Choice/ Contributing Factors**	**Recommended Actions**
Promote affordable homeownership and rental opportunities	Segregation R/ECAPs Disproportionate Housing Needs Publicly Supported Housing	Moderate to high levels of segregation Inequitable access to labor market engagement Insufficient affordable housing in a range of unit sizes Discriminatory patterns in Lending	Promote homeownership and affordable rental opportunities with the use of CDBG funds. Over the next five (5) years: 5 Homeowner Housing Rehabilitated 5 Homeowner Housing units added
Promote Community Development activities in areas with higher rates of poverty	Disparities in Access to Opportunity	Moderate to high levels of segregation Inequitable access to labor market engagement	Promote public services, public facilities, and infrastructure improvements with CDBG funds in low to moderate income neighborhoods or to benefit LMI households. Over the next five (5) years: Benefit 3,000 households with improved access to public services
Promote community and service provider knowledge of ADA laws	Disability and Access	Insufficient accessible affordable housing	Increase outreach and education for housing providers in the City, focusing on legal requirements concerning reasonable accommodation, in coordination with local disability advocate organizations and Intermountain Fair Housing Council (IFHC). Record activities annually.
Increase outreach and education for housing providers in the County and the public	Fair Housing Enforcement and Outreach	Discriminatory patterns in Lending Insufficient fair housing education Insufficient understanding of credit NIMBYism	Continue to partner with IFHC to conduct fair housing outreach and education targeting rental tenants and landlords, providing an overview of fair housing laws and examples of discrimination that housing consumers may encounter in the rental and homeowner housing market. Include materials in both English and Spanish. Promote education through website and online materials, as well as printed materials at City offices and community centers/libraries. Record activities annually.

Section VI. Appendices

A. ADDITIONAL PLAN DATA

Table VI.1
Loans by Loan Purpose by HAL Status
Idaho Falls
2008–2019 HMDA Data

Loan Purpose		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
Home Purchase	HAL	26	12	0	0	1	2	8	13	3	19	68	3	155
	Other	314	228	231	195	460	604	686	920	1090	1087	979	1099	7893
	Percent HAL	7.6%	5.0%	0.0%	0.0%	0.2%	0.3%	1.2%	1.4%	0.3%	1.7%	6.5%	0.3%	1.9%
Home Improvement	HAL	13	2	2	1	1	3	1	0	1	4	18	17	63
	Other	83	23	30	32	91	81	70	108	99	144	181	154	1096
	Percent HAL	13.5%	8.0%	6.2%	3.0%	1.1%	3.6%	1.4%	0.0%	1.0%	2.7%	9.0%	9.9%	1.9%
Refinancing	HAL	106	52	4	3	5	5	1	0	0	0	2	39	217
	Other	353	524	418	305	977	797	324	440	558	382	325	743	6146
	Percent HAL	23.1%	9.0%	0.9%	1.0%	0.5%	0.6%	0.3%	0.0%	0.0%	0.0%	0.6%	5.0%	1.9%
Total	HAL	145	66	6	4	7	10	10	13	4	23	90	72	450
	Other	750	775	679	532	1528	1482	1080	1468	1747	1613	1534	2070	15258
	Percent HAL	16.2%	7.8%	0.9%	0.7%	0.5%	0.7%	0.9%	0.9%	0.2%	1.4%	5.5%	3.4%	2.9%

Table VI.2
HALs Originated by Race of Borrower
Idaho Falls
2008–2019 HMDA Data

Race	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
American Indian	1	0			0	0	0	0	0	0	0	0	1
Asian	0	0			0	0	0	0	0	0	0	0	0
Black	0	0			0	0	0	0	0	0	0	0	0
Pacific Islander	0	0			0	0	0	0	0	0	0	0	0
White	25	12			1	2	8	12	3	18	66	3	150
Not Available	0	0			0	0	0	1	0	1	2	0	4
Not Applicable	0	0			0	0	0	0	0	0	0	0	0
Total	**26**	**12**	**0**	**0**	**1**	**2**	**8**	**13**	**3**	**19**	**68**	**3**	**155**
Hispanic	4	0			0	1	2	1	0	1	8	1	688
Non-Hispanic	22	12			1	1	6	12	3	17	54	2	6864

Table VI.3
Rate of HALs Originated by Race/Ethnicity of Borrower
Idaho Falls
2008–2019 HMDA Data

Race	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Average
American Indian	33.3%	%	%	%	0.0%	0.0%	%	0.0%	0.0%	0.0%	0.0%	0.0%	2.4%
Asian	0.0%	%	%	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Black	%	0.0%	%	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Pacific Islander	0.0%	%	%	%	%	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
White	7.6%	5.2%	%	%	0.2%	0.3%	1.2%	1.4%	0.3%	1.7%	6.7%	0.3%	2.0%
Not Available	0.0%	0.0%	%	%	0.0%	0.0%	0.0%	1.9%	0.0%	2.2%	5.7%	0.0%	1.2%
Not Applicable	%	%	%	%	%	%	%	%	%	%	%	%	%
Average	**7.6%**	**5.0%**	**0.0%**	**0.0%**	**0.2%**	**0.3%**	**1.2%**	**1.4%**	**0.3%**	**1.7%**	**6.5%**	**0.3%**	**1.9%**
Hispanic	13.8%	0.0%	%	%	0.0%	1.7%	4.0%	1.5%	0.0%	1.1%	7.9%	1.0%	2.5%
Non-Hispanic	7.3%	5.4%	%	%	0.2%	0.2%	1.0%	1.5%	0.3%	1.7%	6.0%	0.2%	1.9%

Race	Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
American Indian	HAL	1	0			0	0	0	0	0	0	0	0	1
	Other	2	0	2	1	1	6	0	9	7	4	3	6	41
	Percent HAL	33.3%	%	%	%	0.0%	0.0%	%	0.0%	0.0%	0.0%	0.0%	0.0%	2.4%
Asian	HAL	0	0			0	0	0	0	0	0	0	0	0
	Other	1	0	0	1	4	3	9	10	16	13	11	11	79
	Percent HAL	0.0%	%	%	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Black	HAL	0	0			0	0	0	0	0	0	0	0	0
	Other	0	5	0	0	1	2	4	4	1	5	2	7	31
	Percent HAL	%	0.0%	%	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Pacific Islander	HAL	0	0			0	0	0	0	0	0	0	0	0
	Other	2	0	0	3	0	0	1	2	2	1	4	5	20
	Percent HAL	0.0%	%	%	%	%	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
White	HAL	25	12			1	2	8	12	3	18	66	3	150
	Other	302	217	220	187	440	577	651	842	1001	1019	924	1008	7385
	Percent HAL	7.6%	5.2%	%	%	0.2%	0.3%	1.2%	1.4%	0.3%	1.7%	6.7%	0.3%	2.0%
Not Available	HAL	0	0			0	0	0	1	0	1	2	0	4
	Other	7	6	9	3	14	16	21	53	63	45	33	61	31
	Percent HAL	0.0%	0.0%	%	%	0.0%	0.0%	0.0%	1.9%	0.0%	2.2%	5.7%	0.0%	1.2%
Not Applicable	HAL	0	0			0	0	0	0	0	0	0	0	0
	Other	0	0	0	0	0	0	0	0	0	0	0	0	0
	Percent HAL	%	%	%	%	%	%	%	%	%	%	%	%	%
Total	**HAL**	**26**	**12**	**0**	**0**	**1**	**2**	**8**	**13**	**3**	**19**	**68**	**3**	**155**
	Other	**314**	**228**	**231**	**195**	**460**	**604**	**686**	**920**	**1090**	**1087**	**979**	**1099**	**7893**
	Percent HAL	**7.6%**	**5.0%**	**0.0%**	**0.0%**	**0.2%**	**0.3%**	**1.2%**	**1.4%**	**0.3%**	**1.7%**	**6.5%**	**0.3%**	**1.9%**
Hispanic	HAL	4	0			0	1	2	1	0	1	8	1	688
	Other	25	11	24	26	47	58	48	67	99	90	93	100	18
	Percent HAL	13.8%	0.0%	%	%	0.0%	1.7%	4.0%	1.5%	0.0%	1.1%	7.9%	1.0%	2.5%
Non-Hispanic	HAL	22	12			1	1	6	12	3	17	54	2	6864
	Other	280	210	198	165	401	530	621	797	928	959	844	934	130
	Percent HAL	7.3%	5.4%	%	%	0.2%	0.2%	1.0%	1.5%	0.3%	1.7%	6.0%	0.2%	1.9%

Table VI.4
Loans by HAL Status by Race/Ethnicity of Borrower
Idaho Falls
2008–2019 HMDA Data

Table VI.5
Rates of HALs by Income of Borrower
Idaho Falls
2008–2019 HMDA Data

Income	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Average
$30,000 or Below	4.1%	6.9%	%	%	0.8%	0.0%	2.3%	1.6%	0.6%	3.4%	8.1%	0.0%	2.3%
$30,001–$50,000	6.1%	4.7%	%	%	0.0%	0.5%	2.3%	2.0%	0.3%	2.9%	8.3%	0.3%	2.5%
$50,001–$75,000	14.1%	1.8%	%	%	0.0%	0.8%	0.0%	2.1%	0.4%	0.7%	8.2%	0.7%	2.3%
$75,001–$100,000	10.3%	9.5%	%	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.9%	0.0%	1.0%
$100,00–150,000	5.0%	6.2%	%	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.0%	0.0%	0.4%
Above $150,000	0.0%	0.0%	%	%	0.0%	0.0%	0.0%	0.0%	0.0%	1.8%	0.0%	0.0%	0.3%
Data Missing	%	0.0%	%	%	%	0.0%	%	%	%	%	%	%	0.0%
Average	**7.6%**	**5.0%**	**0.0%**	**0.0%**	**0.2%**	**0.3%**	**1.2%**	**1.4%**	**0.3%**	**1.7%**	**6.5%**	**0.3%**	**1.9%**

Table VI.6
Loans by HAL Status by Income of Borrower
Idaho Falls
2008–2019 HMDA Data

Income		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
$30,000 or Below	HAL	3	4			1	0	3	3	1	6	11	0	32
	Other	70	54	73	68	124	132	126	180	174	170	124	86	1381
	Percent HAL	4.1%	6.9%	%	%	0.8%	0.0%	2.3%	1.6%	0.6%	3.4%	8.1%	0.0%	2.3%
$30,001 –$50,000	HAL	8	4			0	1	5	6	1	10	29	1	65
	Other	123	81	70	49	137	214	216	290	369	336	319	366	2570
	Percent HAL	6.1%	4.7%	%	%	0.0%	0.5%	2.3%	2.0%	0.3%	2.9%	8.3%	0.3%	2.5%
$50,001 –$75,000	HAL	10	1			0	1	0	4	1	2	23	2	44
	Other	61	55	51	46	97	131	168	190	257	277	256	275	1864
	Percent HAL	14.1%	1.8%	%	%	0.0%	0.8%	0.0%	2.1%	0.4%	0.7%	8.2%	0.7%	2.3%
$75,001 –$100,000	HAL	4	2			0	0	0	0	0	0	4	0	10
	Other	35	19	22	13	44	55	82	121	130	141	136	161	959
	Percent HAL	10.3%	9.5%	%	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.9%	0.0%	1.0%
$100,001 –150,000	HAL	1	1			0	0	0	0	0	0	1	0	3
	Other	19	15	14	14	38	47	62	86	110	108	98	137	748
	Percent HAL	5.0%	6.2%	%	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.0%	0.0%	0.4%
Above $150,000	HAL	0	0			0	0	0	0	0	1	0	0	1
	Other	6	2	1	5	20	24	32	53	50	55	46	74	368
	Percent HAL	0.0%	0.0%	%	%	0.0%	0.0%	0.0%	0.0%	0.0%	1.8%	0.0%	0.0%	0.3%
Data Missing	HAL	0	0			0	0	0	0	0	0	0	0	0
	Other	0	2	0	0	0	1	0	0	0	0	0	0	3
	Percent HAL	%	0.0%	%	%	%	0.0%	%	%	%	%	%	%	0.0%
Total	**Other**	**26**	**12**	**0**	**0**	**1**	**2**	**8**	**13**	**3**	**19**	**68**	**3**	**155**
	HAL	**314**	**228**	**231**	**195**	**460**	**604**	**686**	**920**	**1090**	**1087**	**979**	**1099**	**7893**
	Percent HAL	**7.6%**	**5.0%**	**0.0%**	**0.0%**	**0.2%**	**0.3%**	**1.2%**	**1.4%**	**0.3%**	**1.7%**	**6.5%**	**0.3%**	**1.9%**